

Elizabeth Fishel

---

From: Elizabeth Fishel  
Sent: Sunday, March 15, 2020 12:09 PM  
To: Fox, Russell; Donald Stockdale  
Cc: Charles Mathias; Stephen Buenzow (CTR); Sommer Gilbert; Blaise Scinto; Susan Mickley; Sharkey, Steve; Wieczorek, Christopher; Kung, Angela; Donald Stockdale  
Subject: RE: STA Request  
Attachments: 600 MHz STA Request -- Unassigned Spectrum (003).pdf

T-Mobile License LLC's request for an emergency STA to operate on 600 MHz spectrum has been granted via this email for a period of 60 days for the spectrum blocks identified in Exhibit A to T-Mobile's March 13, 2020 request, provided that these are unassigned spectrum blocks in the FCC's inventory and are not already licensed. T-Mobile License LLC will be using this spectrum to provide relief during the state-of emergency caused by the spread of the coronavirus throughout the United States. This STA is authorized on a secondary non-interference basis. T-Mobile License LLC must cease operating on these frequencies if it causes harmful interference to any primary users. Any structure utilized to operate pursuant to this STA must comply with the height limitations specified in Section 17.7 of the Commission's rules or must be registered with the FAA. T-Mobile License LLC must file an STA application for Special Temporary Authorization to continue its operations within 10 days of today's date (March 15, 2020).

---

From: Fox, Russell <RFox@mintz.com>  
Sent: Friday, March 13, 2020 4:21 PM  
To: Donald Stockdale <Donald.Stockdale@fcc.gov>  
Cc: Charles Mathias <Charles.Mathias@fcc.gov>; Stephen Buenzow (CTR) <Stephen.Buenzow.CTR@fcc.gov>; Sommer Gilbert <Sommer.Gilbert@fcc.gov>; Elizabeth Fishel <Elizabeth.Fishel@fcc.gov>; Blaise Scinto <Blaise.Scinto@fcc.gov>; Susan Mickley <Susan.Mickley@fcc.gov>; Sharkey, Steve <Steve.Sharkey@T-Mobile.com>; Wieczorek, Christopher <Chris.Wieczorek@T-Mobile.com>; Kung, Angela <AYKung@mintz.com> Subject: STA Request

Mr. Stockdale:

Attached is a request for special temporary authority submitted on behalf of our client, T-Mobile USA, Inc.

If you have any questions, please contact me or T-Mobile's Steve Sharkey.

Russell H Fox  
Member

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.  
701 Pennsylvania Ave., NW, Suite 900, Washington, DC 20004 [+1.202.434.7483](tel:+12024347483)  
[RFox@mintz.com](mailto:RFox@mintz.com) | [Mintz.com](http://Mintz.com)



---

STATEMENT OF CONFIDENTIALITY:

The information contained in this electronic message and any attachments to this message are intended for the exclusive use of the addressee(s) and may contain confidential or privileged information. If you are not the intended recipient, or the person responsible for delivering the e-mail to the intended recipient, be advised you have received this message in error and that any use, dissemination, forwarding, printing, or copying is strictly prohibited. Please notify Mintz, Levin, Cohn, Ferris, Glovsky and Popeo immediately at either (617) 542-6000 or at [DirectorofIT@Mintz.com](mailto:DirectorofIT@Mintz.com), and destroy all copies of this message and any attachments. You will be reimbursed for reasonable costs incurred in notifying us.



601 Pennsylvania Ave., NW  
Suite 800  
Washington, DC 20004  
202-654-5900

March 13, 2020

**Via E-Mail**

Donald Stockdale  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington DC, 20554

**Re: Emergency Request for Special Temporary Authority**

Dear Mr. Stockdale:

T-Mobile USA, Inc. (“T-Mobile”),<sup>1/</sup> on behalf of its subsidiary, T-Mobile License, LLC and pursuant to Section 1.931 of the Commission’s rules,<sup>2/</sup> hereby requests emergency special temporary authority (“STA”) to use spectrum in the 600 MHz band for which it is not licensed. T-Mobile will use this spectrum to provide enhanced wireless broadband services for a period of sixty (60) days from Commission action to help keep Americans connected during the ongoing novel coronavirus pandemic. T-Mobile seeks Commission action as part of its Keep Americans Connected Pledge to help citizens overcome current challenges that have required them to remain socially distant.<sup>3/</sup>

***STA is in the Public Interest***

With each passing day, more Americans are being separated from each other as the United States continues to fight against the novel coronavirus. Americans have been directed to work from home and take classes remotely.<sup>4/</sup> T-Mobile can help. As the Commission is aware, T-Mobile

---

<sup>1/</sup> T-Mobile USA, Inc. is a wholly owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

<sup>2/</sup> See 47 C.F.R. § 1.931(a)(2)(iv).

<sup>3/</sup> See News Release, *Chairman Pai Launches the Keep Americans Connected Pledge*, FCC (Mar. 13, 2020), <https://docs.fcc.gov/public/attachments/DOC-363033A1.pdf>

<sup>4/</sup> See, e.g., *FCC Encouraging Staff to Telework Due to Coronavirus*, COMM. DAILY (Mar. 12, 2020); Melissa Korn, *Coronavirus Prompts Colleges to Send Students Home*, WALL STREET JOURNAL (Mar. 10, 2020), <https://www.wsj.com/articles/coronavirus-prompts-colleges-to-send-students-home-11583862936?mod=djem10point>; Ben Chapman, *New York City Shuts Two Public Schools Over*

has aggressively built out the 600 MHz spectrum for which it is authorized, delivering both Fourth Generation (“4G”) LTE and Fifth Generation (“5G”) wireless service nationwide.<sup>5/</sup> T-Mobile can even better meet the unprecedented need for our country to be connected by having access to additional 600 MHz spectrum – deploying additional capacity in areas where it has already, and where it soon expects to, provide service, including in rural areas. More spectrum capacity will enable Americans to even more effectively telework, engage in distance learning (including taking tests and submitting homework, projects, and other coursework), obtain medical advice through telehealth, and simply remain connected to loved ones who may be quarantined, through applications like FaceTime. And, more capacity on T-Mobile’s network will ensure that first responders and others can communicate in the event of an escalating crisis.

Accordingly, T-Mobile requests authority, for a period of sixty (60) days from Commission action, to use the spectrum listed in Exhibit A to this letter. Exhibit A lists spectrum in the 600 MHz band for which the Commission has not yet authorized usage. No other party will be disadvantaged by grant of the STA because the Commission has not yet issued licenses for the spectrum shown in Exhibit A. To the contrary, T-Mobile was the most successful bidder in the Commission’s auction of 600 MHz spectrum.<sup>6/</sup> And, as noted above, it has already deployed much of the spectrum for which it is licensed. Accordingly, T-Mobile is uniquely positioned to use this spectrum on a temporary basis to help meet America’s connectivity demands.<sup>7/</sup>

### ***Requested Rule Waivers***

T-Mobile recognizes that the Commission’s rules generally require that STA requests be submitted electronically on FCC Form 601.<sup>8/</sup> Accordingly, it hereby requests waiver of that rule. Waiver is justified because the Universal Licensing System is not optimized to allow applicants to seek permission to use 600 MHz spectrum for which an applicant is not authorized, on a temporary basis. While T-Mobile could potentially submit a request using FCC Form 601 in a paper format, doing so would elevate form over substance and potentially delay Commission

---

*Coronavirus Case*, WALL STREET JOURNAL (Mar. 12, 2020), <https://www.wsj.com/articles/new-york-city-shuts-two-public-schools-over-coronavirus-case-11584019007?mod=djem10point>.

<sup>5/</sup> See, e.g., T-Mobile News, *T-Mobile Reports Record Financials and Strong Customer Growth in FY 2019, Beating Increased Guidance While Balancing Growth and Profitability* (Feb. 6, 2020), <https://www.t-mobile.com/news/t-mobile-q4-fy19-earnings>; Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile, to Ms. Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268, *et al.*, at 1 (filed Oct. 24, 2019) (reporting that T-Mobile is proceeding on, or ahead of, the schedule the Commission established for clearing the 600 MHz band).

<sup>6/</sup> See *Incentive Auction Closing and Channel Reassignment Public Notice, et al.*, Public Notice, 32 FCC Rcd 2786, Appx. B (2017).

<sup>7/</sup> T-Mobile recognizes that the 600 MHz band is not yet available in all markets because of the ongoing re-packing of broadcasters from the band. T-Mobile will not use any spectrum – whether authorized to others or not yet licensed by the Commission – that would conflict with any broadcaster’s continuing authority to use the spectrum.

<sup>8/</sup> See 47 C.F.R. § 1.931.

action on this request.<sup>9/</sup> Seeking STA through this letter will likely permit the Commission to act more quickly, allowing T-Mobile to help bridge the connectivity gap sooner. Indeed, the Commission rules specifically contemplate that STA requests of an urgent nature will be submitted directly to the appropriate Bureau, with the Commission subsequently billing the applicant for the required fees.<sup>10/</sup>

\* \* \* \* \*

T-Mobile looks forward to your prompt response. If you have any questions, please feel free to contact me directly.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey  
Vice President, Government Affairs  
Technology and Engineering Policy

#### Attachments

cc: (Electronically, with attachments)  
Charles Mathias  
Stephen Buenzow  
Sommer Gilbert  
Elizabeth Fishel  
Blaise Scinto  
Susan Mickley

---

<sup>9/</sup> Nevertheless, T-Mobile expects to submit a paper FCC Form 601 within the next ten (10) days confirming this request.

<sup>10/</sup> See 47 C.F.R. § 1.1121.

**Exhibit A**

<b>Auction License Offered</b>	<b>Market</b>	<b>Market Name</b>	<b>Block</b>
WT-PEA002-G	PEA002	Los Angeles, CA	G
WT-PEA018-A	PEA018	San Diego, CA	A
WT-PEA018-B	PEA018	San Diego, CA	B
WT-PEA047-F	PEA047	Brownsville, TX	F
WT-PEA047-G	PEA047	Brownsville, TX	G
WT-PEA053-F	PEA053	Tucson, AZ	F
WT-PEA053-G	PEA053	Tucson, AZ	G
WT-PEA094-A	PEA094	Waco, TX	A
WT-PEA097-F	PEA097	Mankato, MN	F
WT-PEA097-G	PEA097	Mankato, MN	G
WT-PEA102-A	PEA102	Grand Junction, CO	A
WT-PEA106-F	PEA106	Zanesville, OH	F
WT-PEA106-G	PEA106	Zanesville, OH	G
WT-PEA110-E	PEA110	Jackson, TN	E
WT-PEA110-F	PEA110	Jackson, TN	F
WT-PEA110-G	PEA110	Jackson, TN	G
WT-PEA112-G	PEA112	Bowling Green, KY	G
WT-PEA117-E	PEA117	La Grange, GA	E
WT-PEA117-F	PEA117	La Grange, GA	F
WT-PEA117-G	PEA117	La Grange, GA	G
WT-PEA118-E	PEA118	Richmond, IN	E
WT-PEA118-F	PEA118	Richmond, IN	F
WT-PEA118-G	PEA118	Richmond, IN	G
WT-PEA123-A	PEA123	Mansfield, OH	A
WT-PEA125-F	PEA125	Alton, IL	F
WT-PEA125-G	PEA125	Alton, IL	G
WT-PEA126-F	PEA126	Casa Grande, AZ	F
WT-PEA126-G	PEA126	Casa Grande, AZ	G
WT-PEA133-F	PEA133	Nacogdoches, TX	F
WT-PEA133-G	PEA133	Nacogdoches, TX	G
WT-PEA134-F	PEA134	Newark, OH	F
WT-PEA134-G	PEA134	Newark, OH	G
WT-PEA136-E	PEA136	Williamsport, PA	E
WT-PEA136-F	PEA136	Williamsport, PA	F
WT-PEA136-G	PEA136	Williamsport, PA	G
WT-PEA137-G	PEA137	Eau Claire, WI	G
WT-PEA139-A	PEA139	Hot Springs, AR	A
WT-PEA140-A	PEA140	Fredericksburg, VA	A
WT-PEA141-F	PEA141	Brainerd, MN	F
WT-PEA141-G	PEA141	Brainerd, MN	G

<b>Auction License Offered</b>	<b>Market</b>	<b>Market Name</b>	<b>Block</b>
WT-PEA142-A	PEA142	Merced, CA	A
WT-PEA144-F	PEA144	Paris, TX	F
WT-PEA144-G	PEA144	Paris, TX	G
WT-PEA145-F	PEA145	Columbia, TN	F
WT-PEA145-G	PEA145	Columbia, TN	G
WT-PEA148-F	PEA148	Bellingham, WA	F
WT-PEA148-G	PEA148	Bellingham, WA	G
WT-PEA152-F	PEA152	Tyler, TX	F
WT-PEA152-G	PEA152	Tyler, TX	G
WT-PEA157-A	PEA157	Yuma, AZ	A
WT-PEA160-F	PEA160	Victoria, TX	F
WT-PEA160-G	PEA160	Victoria, TX	G
WT-PEA161-F	PEA161	Carbondale, IL	F
WT-PEA161-G	PEA161	Carbondale, IL	G
WT-PEA162-A	PEA162	Elizabethtown, KY	A
WT-PEA165-E	PEA165	Rome, GA	E
WT-PEA165-F	PEA165	Rome, GA	F
WT-PEA165-G	PEA165	Rome, GA	G
WT-PEA170-G	PEA170	Dothan, AL	G
WT-PEA174-F	PEA174	Springfield, MO	F
WT-PEA174-G	PEA174	Springfield, MO	G
WT-PEA185-G	PEA185	Marquette, MI	G
WT-PEA196-F	PEA196	Cape Girardeau, MO	F
WT-PEA196-G	PEA196	Cape Girardeau, MO	G
WT-PEA199-E	PEA199	Dalton, GA	E
WT-PEA199-F	PEA199	Dalton, GA	F
WT-PEA199-G	PEA199	Dalton, GA	G
WT-PEA201-F	PEA201	Eagle Pass, TX	F
WT-PEA201-G	PEA201	Eagle Pass, TX	G
WT-PEA207-G	PEA207	Brunswick, GA	G
WT-PEA221-F	PEA221	Laredo, TX	F
WT-PEA221-G	PEA221	Laredo, TX	G
WT-PEA239-A	PEA239	Kannapolis, NC	A
WT-PEA249-G	PEA249	Bryan, TX	G
WT-PEA254-G	PEA254	Merrill, WI	G
WT-PEA258-G	PEA258	Cullman, AL	G
WT-PEA270-E	PEA270	Ottawa, IL	E
WT-PEA270-F	PEA270	Ottawa, IL	F
WT-PEA270-G	PEA270	Ottawa, IL	G
WT-PEA272-F	PEA272	Brownwood, TX	F
WT-PEA272-G	PEA272	Brownwood, TX	G
WT-PEA273-E	PEA273	Bloomington, IL	E

<b>Auction License Offered</b>	<b>Market</b>	<b>Market Name</b>	<b>Block</b>
WT-PEA273-F	PEA273	Bloomington, IL	F
WT-PEA275-F	PEA275	Corsicana, TX	F
WT-PEA275-G	PEA275	Corsicana, TX	G
WT-PEA284-F	PEA284	Greenwood, SC	F
WT-PEA284-G	PEA284	Greenwood, SC	G
WT-PEA293-F	PEA293	Lawrenceburg, TN	F
WT-PEA293-G	PEA293	Lawrenceburg, TN	G
WT-PEA296-F	PEA296	Pottsville, PA	F
WT-PEA296-G	PEA296	Pottsville, PA	G
WT-PEA310-F	PEA310	Farmington, MO	F
WT-PEA310-G	PEA310	Farmington, MO	G
WT-PEA313-F	PEA313	Lockhart, TX	F
WT-PEA313-G	PEA313	Lockhart, TX	G
WT-PEA314-F	PEA314	Jacksonville, TX	F
WT-PEA314-G	PEA314	Jacksonville, TX	G
WT-PEA321-A	PEA321	Batesville, IN	A
WT-PEA324-E	PEA324	Honesdale, PA	E
WT-PEA324-F	PEA324	Honesdale, PA	F
WT-PEA324-G	PEA324	Honesdale, PA	G
WT-PEA326-G	PEA326	Fergus Falls, MN	G
WT-PEA327-F	PEA327	Orangeburg, SC	F
WT-PEA327-G	PEA327	Orangeburg, SC	G
WT-PEA332-F	PEA332	Bennettsville, SC	F
WT-PEA332-G	PEA332	Bennettsville, SC	G
WT-PEA333-A	PEA333	Sidney, OH	A
WT-PEA334-A	PEA334	Pampa, TX	A
WT-PEA335-A	PEA335	Natchitoches, LA	A
WT-PEA337-F	PEA337	Mineral Wells, TX	F
WT-PEA337-G	PEA337	Mineral Wells, TX	G
WT-PEA339-A	PEA339	Scottsbluff, NE	A
WT-PEA342-G	PEA342	Mitchell, SD	G
WT-PEA345-F	PEA345	Newberry, SC	F
WT-PEA345-G	PEA345	Newberry, SC	G
WT-PEA347-F	PEA347	New Roads, LA	F
WT-PEA347-G	PEA347	New Roads, LA	G
WT-PEA350-F	PEA350	Forrest City, AR	F
WT-PEA350-G	PEA350	Forrest City, AR	G
WT-PEA351-G	PEA351	Dickinson, ND	G
WT-PEA352-F	PEA352	Gonzales, TX	F
WT-PEA352-G	PEA352	Gonzales, TX	G
WT-PEA353-G	PEA353	Watseka, IL	G
WT-PEA358-F	PEA358	Marble Falls, TX	F

<b>Auction License Offered</b>	<b>Market</b>	<b>Market Name</b>	<b>Block</b>
WT-PEA358-G	PEA358	Marble Falls, TX	G
WT-PEA361-A	PEA361	Richfield, UT	A
WT-PEA362-F	PEA362	Payette, ID	F
WT-PEA362-G	PEA362	Payette, ID	G
WT-PEA375-F	PEA375	Deming, NM	F
WT-PEA375-G	PEA375	Deming, NM	G
WT-PEA381-A	PEA381	Del Rio, TX	A
WT-PEA392-A	PEA392	Maryville, MO	A
WT-PEA399-F	PEA399	Lampasas, TX	F
WT-PEA399-G	PEA399	Lampasas, TX	G
WT-PEA407-G	PEA407	Salmon, ID	G
WT-PEA411-A	PEA411	Van Horn, TX	A

## Connie Diaz

---

**From:** Elizabeth Fishel  
**Sent:** Sunday, March 15, 2020 1:36 PM  
**To:** Fox, Russell; Donald Stockdale  
**Cc:** Blaise Scinto; Charles Mathias; Stephen Buenzow (CTR); Sommer Gilbert; Susan Mickley; Sharkey, Steve; Kung, Angela; Wieczorek, Christopher  
**Subject:** FW: STA Request  
**Attachments:** 600 MHz STA Request -- Bluewater Wireless II, L.P..pdf

T-Mobile License LLC's request for an emergency STA to operate on the spectrum; and within the market areas that are associated with Bluewater Wireless II, L.P. 's WT (600 MHz) licenses that are identified in the attached document is granted via this email for a period of 60 days. T-Mobile License LLC must cease its operations on this spectrum if Bluewater Wireless II, L.P. withdraws its approval for T-Mobile License LLC's use of this spectrum at any time. T-Mobile License LLC will be using this spectrum to provide relief during the state-of emergency caused by the spread of the coronavirus throughout the United States. This STA is authorized on a secondary non-interference basis. T-Mobile License LLC must cease operating on these frequencies if it causes harmful interference to any primary users. Any structure utilized to operate pursuant to this STA must comply with the height limitations specified in Section 17.7 of the Commission's rules or must be registered with the FAA. T-Mobile License LLC must file an STA application for Special Temporary Authorization to continue its operations within 10 days of today's date (March 15, 2020).

---

**From:** Fox, Russell <RFox@mintz.com>  
**Sent:** Sunday, March 15, 2020 7:42 AM  
**To:** Donald Stockdale <Donald.Stockdale@fcc.gov>  
**Cc:** Charles Mathias <Charles.Mathias@fcc.gov>; Stephen Buenzow (CTR) <Stephen.Buenzow.CTR@fcc.gov>; Sommer Gilbert <Sommer.Gilbert@fcc.gov>; Elizabeth Fishel <Elizabeth.Fishel@fcc.gov>; Blaise Scinto <Blaise.Scinto@fcc.gov>; Susan Mickley <Susan.Mickley@fcc.gov>; Sharkey, Steve <Steve.Sharkey@T-Mobile.com>; Wieczorek, Christopher <Chris.Wieczorek@T-Mobile.com>; Kung, Angela <AYKung@mintz.com>  
**Subject:** RE: STA Request

Three additional requests are attached.

Russell

---

**From:** Fox, Russell <[RFox@mintz.com](mailto:RFox@mintz.com)>  
**Sent:** Friday, March 13, 2020 6:53 PM  
**To:** [donald.stockdale@fcc.gov](mailto:donald.stockdale@fcc.gov)  
**Cc:** [Charles.Mathias@fcc.gov](mailto:Charles.Mathias@fcc.gov); [Stephen.Buenzow.CTR@fcc.gov](mailto:Stephen.Buenzow.CTR@fcc.gov); [Sommer.Gilbert@fcc.gov](mailto:Sommer.Gilbert@fcc.gov); [Elizabeth.Fishel@fcc.gov](mailto:Elizabeth.Fishel@fcc.gov); [Blaise.Scinto@fcc.gov](mailto:Blaise.Scinto@fcc.gov); [Susan.Mickley@fcc.gov](mailto:Susan.Mickley@fcc.gov); Sharkey, Steve <[Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com)>; Wieczorek, Christopher <[Chris.Wieczorek@T-Mobile.com](mailto:Chris.Wieczorek@T-Mobile.com)>; Kung, Angela <[AYKung@mintz.com](mailto:AYKung@mintz.com)>  
**Subject:** RE: STA Request

Attached are four additional requests for special temporary authority.

Have a good and safe weekend.

---

**From:** Fox, Russell

**Sent:** Friday, March 13, 2020 4:21 PM

**To:** 'donald.stockdale@fcc.gov' <[donald.stockdale@fcc.gov](mailto:donald.stockdale@fcc.gov)>

**Cc:** 'Charles.Mathias@fcc.gov' <[Charles.Mathias@fcc.gov](mailto:Charles.Mathias@fcc.gov)>; 'Stephen.Buenzow.CTR@fcc.gov' <[Stephen.Buenzow.CTR@fcc.gov](mailto:Stephen.Buenzow.CTR@fcc.gov)>; 'Sommer.Gilbert@fcc.gov' <[Sommer.Gilbert@fcc.gov](mailto:Sommer.Gilbert@fcc.gov)>; 'Elizabeth.Fishel@fcc.gov' <[Elizabeth.Fishel@fcc.gov](mailto:Elizabeth.Fishel@fcc.gov)>; 'Blaise.Scinto@fcc.gov' <[Blaise.Scinto@fcc.gov](mailto:Blaise.Scinto@fcc.gov)>; 'Susan.Mickley@fcc.gov' <[Susan.Mickley@fcc.gov](mailto:Susan.Mickley@fcc.gov)>; Sharkey, Steve <[Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com)>; Wieczorek, Christopher <[Chris.Wieczorek@T-Mobile.com](mailto:Chris.Wieczorek@T-Mobile.com)>; Kung, Angela <[AYKung@mintz.com](mailto:AYKung@mintz.com)>

**Subject:** STA Request

Mr. Stockdale:

Attached is a request for special temporary authority submitted on behalf of our client, T-Mobile USA, Inc.

If you have any questions, please contact me or T-Mobile's Steve Sharkey.

**Russell H Fox**

*Member*

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.  
701 Pennsylvania Ave., NW, Suite 900, Washington, DC 20004  
+1.202.434.7483  
[RFox@mintz.com](mailto:RFox@mintz.com) | [Mintz.com](http://Mintz.com)



---

STATEMENT OF CONFIDENTIALITY:

The information contained in this electronic message and any attachments to this message are intended for the exclusive use of the addressee(s) and may contain confidential or privileged information. If you are not the intended recipient, or the person responsible for delivering the e-mail to the intended recipient, be advised you have received this message in error and that any use, dissemination, forwarding, printing, or copying is strictly prohibited. Please notify Mintz, Levin, Cohn, Ferris, Glovsky and Popeo immediately at either (617) 542-6000 or at [DirectorofIT@Mintz.com](mailto:DirectorofIT@Mintz.com), and destroy all copies of this message and any attachments. You will be reimbursed for reasonable costs incurred in notifying us.



601 Pennsylvania Ave., NW  
Suite 800  
Washington, DC 20004  
202-654-5900

March 15, 2020

**Via E-Mail**

Donald Stockdale  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington DC, 20554

**Re: Emergency Request for Special Temporary Authority**

Dear Mr. Stockdale:

T-Mobile USA, Inc. (“T-Mobile”),<sup>1/</sup> on behalf of its subsidiary, T-Mobile License, LLC and pursuant to Section 1.931 of the Commission’s rules,<sup>2/</sup> hereby requests emergency special temporary authority (“STA”) to use spectrum in the 600 MHz band for which it is not licensed. T-Mobile will use this spectrum to provide enhanced wireless broadband services for a period of sixty (60) days from Commission action to help keep Americans connected during the ongoing novel coronavirus pandemic. T-Mobile seeks Commission action as part of its Keep Americans Connected Pledge to help citizens overcome current challenges that have required them to remain socially distant.<sup>3/</sup>

***STA is in the Public Interest***

With each passing day, more Americans are being separated from each other as the United States continues to fight against the novel coronavirus. Americans have been directed to work from home and take classes remotely.<sup>4/</sup> T-Mobile can help. As the Commission is aware, T-Mobile

---

<sup>1/</sup> T-Mobile USA, Inc. is a wholly owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

<sup>2/</sup> See 47 C.F.R. § 1.931(a)(2)(iv).

<sup>3/</sup> See News Release, *Chairman Pai Launches the Keep Americans Connected Pledge*, FCC (Mar. 13, 2020), <https://docs.fcc.gov/public/attachments/DOC-363033A1.pdf>

<sup>4/</sup> See, e.g., *FCC Encouraging Staff to Telework Due to Coronavirus*, COMM. DAILY (Mar. 12, 2020); Melissa Korn, *Coronavirus Prompts Colleges to Send Students Home*, WALL STREET JOURNAL (Mar. 10, 2020), <https://www.wsj.com/articles/coronavirus-prompts-colleges-to-send-students-home-11583862936?mod=djem10point>; Ben Chapman, *New York City Shuts Two Public Schools Over*

has aggressively built out the 600 MHz spectrum for which it is authorized, delivering both Fourth Generation (“4G”) LTE and Fifth Generation (“5G”) wireless service nationwide.<sup>5/</sup> T-Mobile can even better meet the unprecedented need for our country to be connected by having access to additional 600 MHz spectrum – deploying additional capacity in areas where it has already provided, and where it soon expects to provide, service, including in rural areas. More spectrum capacity will enable Americans to even more effectively telework, engage in distance learning (including taking tests and submitting homework, projects, and other coursework), obtain medical advice through telehealth, and simply remain connected to loved ones who may be quarantined, through applications like FaceTime. And, more capacity on T-Mobile’s network will ensure that first responders and others can communicate in the event of an escalating crisis.

Accordingly, T-Mobile requests authority, for a period of sixty (60) days from Commission action, to use the spectrum listed in Exhibit A, which is currently licensed to Bluewater Wireless II, L.P. (“Bluewater”). Bluewater has consented to T-Mobile's use of the spectrum.<sup>6/</sup> Bluewater is not currently using the licensed spectrum and has agreed to support T-Mobile’s temporary use of it in support of the Keep Americans Connected Pledge.

### ***Requested Rule Waivers***

T-Mobile recognizes that the Commission’s rules generally require that STA requests be submitted electronically on FCC Form 601.<sup>7/</sup> Accordingly, it hereby requests waiver of that rule. Waiver is justified because the Universal Licensing System is not optimized to allow applicants to seek permission to use 600 MHz spectrum for which an applicant is not authorized, on a temporary basis. While T-Mobile could potentially submit a request using FCC Form 601 in a paper format, doing so would elevate form over substance and potentially delay Commission action on this request.<sup>8/</sup> Seeking STA through this letter will likely permit the Commission to act more quickly, allowing T-Mobile to help bridge the connectivity gap sooner. Indeed, the

---

*Coronavirus Case*, WALL STREET JOURNAL (Mar. 12, 2020), <https://www.wsj.com/articles/new-york-city-shuts-two-public-schools-over-coronavirus-case-11584019007?mod=djem10point>.

<sup>5/</sup> See, e.g., T-Mobile News, *T-Mobile Reports Record Financials and Strong Customer Growth in FY 2019, Beating Increased Guidance While Balancing Growth and Profitability* (Feb. 6, 2020), <https://www.t-mobile.com/news/t-mobile-q4-fy19-earnings>; Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile, to Ms. Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268, *et al.*, at 1 (filed Oct. 24, 2019) (reporting that T-Mobile is proceeding on, or ahead of, the schedule the Commission established for clearing the 600 MHz band).

<sup>6/</sup> While Bluewater and T-Mobile may have otherwise sought to permit T-Mobile’s use of the spectrum through the usual Commission leasing process, resulting in T-Mobile’s expeditious use of the spectrum, T-Mobile believes that, because of the unique nature of the 600 MHz spectrum, waiver of the rules may be required, defeating the Commission’s streamlined leasing procedures. (In particular, in order to lease the 600 MHz spectrum, T-Mobile would be required to conduct analyses under Sections 20.22(c)(2) and (3). Grant of this STA request will allow T-Mobile to use the spectrum more quickly by alleviating the need for this analysis.)

<sup>7/</sup> See 47 C.F.R. § 1.931.

<sup>8/</sup> Nevertheless, T-Mobile expects to submit a paper FCC Form 601 within the next ten (10) days confirming this request.

Commission's rules specifically contemplate that STA requests of an urgent nature will be submitted directly to the appropriate Bureau, with the Commission subsequently billing the applicant for the required fees.<sup>9/</sup>

\* \* \* \*

T-Mobile looks forward to your prompt response. If you have any questions, please feel free to contact me directly.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey  
Vice President, Government Affairs  
Technology and Engineering Policy

#### Attachments

cc: (Electronically, with attachments)  
Charles Mathias  
Stephen Buenzow  
Sommer Gilbert  
Elizabeth Fishel  
Blaise Scinto  
Susan Mickley

---

<sup>9/</sup> See 47 C.F.R. § 1.1121.

**Exhibit A**

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA026	Las Vegas, NV	A	WRBV760
PEA030	Kansas City, MO	A	WRBV761
PEA020	Denver, CO	A	WRBV762
PEA012	Detroit, MI	A	WRBV763
PEA059	Memphis, TN	G	WRBV764
PEA015	Phoenix, AZ	B	WRBV765
PEA308	Americus, GA	A	WRBV766
PEA262	Hilton Head Island, SC	A	WRBV767
PEA128	Macon, GA	A	WRBV768
PEA151	Winston-Salem, NC	A	WRBV769
PEA094	Waco, TX	G	WRBV770
PEA037	Columbus, OH	E	WRBV771
PEA029	Jacksonville, FL	G	WRBV772
PEA207	Brunswick, GA	A	WRBV773
PEA129	Springfield, IL	E	WRBV774
PEA104	Fort Collins, CO	F	WRBV775
PEA104	Fort Collins, CO	G	WRBV776
PEA010	Houston, TX	A	WRBV777
PEA105	Augusta, GA	G	WRBV778
PEA074	Chattanooga, TN	G	WRBV779
PEA057	Richmond, VA	A	WRBV780
PEA027	Salt Lake City, UT	A	WRBV781
PEA011	Atlanta, GA	A	WRBV782
PEA386	Barnwell, SC	G	WRBV783
PEA333	Sidney, OH	G	WRBV784
PEA321	Batesville, IN	G	WRBV785
PEA123	Mansfield, OH	G	WRBV786
PEA191	Petersburg, VA	F	WRBV787
PEA177	Savannah, GA	F	WRBV788
PEA034	Fresno, CA	A	WRBV789
PEA023	Pittsburgh, PA	A	WRBV790
PEA019	Portland, OR	A	WRBV791
PEA013	Orlando, FL	A	WRBV792
PEA132	Corpus Christi, TX	G	WRBV793
PEA036	New Orleans, LA	A	WRBV794
PEA098	Johnson City, TN	A	WRBV795
PEA055	Huntsville, AL	A	WRBV796
PEA249	Bryan, TX	A	WRBV797
PEA076	Reno, NV	A	WRBV798
PEA050	Greenville, SC	G	WRBV799

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA043	Charlotte, NC	G	WRBV800
PEA186	Rock Hill, SC	F	WRBV801
PEA186	Rock Hill, SC	G	WRBV802
PEA078	Greensboro, NC	F	WRBV803
PEA085	Charleston, SC	F	WRBV804
PEA045	Raleigh, NC	F	WRBV805
PEA031	Indianapolis, IN	F	WRBV806
PEA022	Sacramento, CA	F	WRBV807
PEA193	Saint Joseph, MO	A	WRBV808
PEA091	Colorado Springs, CO	A	WRBV809
PEA087	Pensacola, FL	F	WRBV810
PEA068	Grand Rapids, MI	A	WRBV811
PEA061	Toledo, OH	A	WRBV812
PEA056	Kalamazoo, MI	A	WRBV813
PEA292	Pueblo, CO	G	WRBV814
PEA247	Nampa, ID	A	WRBV815
PEA156	Boise City, ID	A	WRBV816
PEA033	Virginia Beach, VA	A	WRBV817
PEA039	Oklahoma City, OK	A	WRBV818
PEA025	Cincinnati, OH	A	WRBV819
PEA035	Austin, TX	A	WRBV820
PEA014	Cleveland, OH	A	WRBV821
PEA066	Lansing, MI	A	WRBV822
PEA021	Tampa, FL	B	WRBV823
PEA051	Louisville, KY	A	WRBV824
PEA063	Tulsa, OK	A	WRBV825

Elizabeth Fishel

---

From: Elizabeth Fishel  
Sent: Sunday, March 15, 2020 1:17 PM  
To: Fox, Russell; Donald Stockdale  
Cc: Blaise Scinto; Charles Mathias; Sommer Gilbert; Susan Mickley; Stephen Buenzow (CTR); Sharkey, Steve; Kung, Angela; Wieczorek, Christopher  
Subject: FW: STA Request  
Attachments: 600 MHz STA Request -- Channel 51 License Co LLC.pdf

T-Mobile License LLC's request for an emergency STA to operate on the spectrum; and within the market areas associated with Channel 51 License Co LLC's 8 WT (600 MHz) licenses has been granted via this email for a period of 60 days. T-Mobile License LLC must cease its operations on this spectrum if Channel 51 License Co LLC withdraws its approval for T-Mobile License LLC's use of this spectrum at any time. T-Mobile License LLC will be using this spectrum to provide relief during the state-of emergency caused by the spread of the coronavirus throughout the United States. This STA is authorized on a secondary non-interference basis. T-Mobile License LLC must cease operating on these frequencies if it causes harmful interference to any primary users. Any structure utilized to operate pursuant to this STA must comply with the height limitations specified in Section 17.7 of the Commission's rules or must be registered with the FAA. T-Mobile License LLC must file an STA application for Special Temporary Authorization to continue its operations within 10 days of today's date (March 15, 2020).

From: Fox, Russell <[RFox@mintz.com](mailto:RFox@mintz.com)>  
Sent: Sunday, March 15, 2020 7:42 AM  
To: Donald Stockdale <[Donald.Stockdale@fcc.gov](mailto:Donald.Stockdale@fcc.gov)>

---

From: Fox, Russell <[RFox@mintz.com](mailto:RFox@mintz.com)>  
Sent: Friday, March 13, 2020 6:53 PM  
To: Donald Stockdale <[Donald.Stockdale@fcc.gov](mailto:Donald.Stockdale@fcc.gov)>  
Cc: Charles Mathias <[Charles.Mathias@fcc.gov](mailto:Charles.Mathias@fcc.gov)>; Stephen Buenzow (CTR) <[Stephen.Buenzow.CTR@fcc.gov](mailto:Stephen.Buenzow.CTR@fcc.gov)>; Sommer Gilbert <[Sommer.Gilbert@fcc.gov](mailto:Sommer.Gilbert@fcc.gov)>; Elizabeth Fishel <[Elizabeth.Fishel@fcc.gov](mailto:Elizabeth.Fishel@fcc.gov)>; Blaise Scinto <[Blaise.Scinto@fcc.gov](mailto:Blaise.Scinto@fcc.gov)>; Susan Mickley <[Susan.Mickley@fcc.gov](mailto:Susan.Mickley@fcc.gov)>; Sharkey, Steve <[Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com)>; Wieczorek, Christopher <[Chris.Wieczorek@T-Mobile.com](mailto:Chris.Wieczorek@T-Mobile.com)>; Kung, Angela <[AYKung@mintz.com](mailto:AYKung@mintz.com)>  
Subject: RE: STA Request

Attached are four additional requests for special temporary authority.

Have a good and safe weekend.

---

From: Fox, Russell  
Sent: Friday, March 13, 2020 4:21 PM  
To: 'donald.stockdale@fcc.gov' <[donald.stockdale@fcc.gov](mailto:donald.stockdale@fcc.gov)>  
Cc: 'Charles.Mathias@fcc.gov' <[Charles.Mathias@fcc.gov](mailto:Charles.Mathias@fcc.gov)>; 'Stephen.Buenzow.CTR@fcc.gov' <[Stephen.Buenzow.CTR@fcc.gov](mailto:Stephen.Buenzow.CTR@fcc.gov)>; 'Sommer.Gilbert@fcc.gov' <[Sommer.Gilbert@fcc.gov](mailto:Sommer.Gilbert@fcc.gov)>; 'Elizabeth.Fishel@fcc.gov' <[Elizabeth.Fishel@fcc.gov](mailto:Elizabeth.Fishel@fcc.gov)>; 'Blaise.Scinto@fcc.gov' <[Blaise.Scinto@fcc.gov](mailto:Blaise.Scinto@fcc.gov)>; 'Susan.Mickley@fcc.gov' <[Susan.Mickley@fcc.gov](mailto:Susan.Mickley@fcc.gov)>; Sharkey, Steve <[Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com)>; Wieczorek, Christopher

<[Chris.Wieczorek@T-Mobile.com](mailto:Chris.Wieczorek@T-Mobile.com)>; Kung, Angela <[AYKung@mintz.com](mailto:AYKung@mintz.com)>

Subject: STA Request

1

Mr. Stockdale:

Attached is a request for special temporary authority submitted on behalf of our client, T-Mobile USA, Inc.

If you have any questions, please contact me or T-Mobile's Steve Sharkey.

Russell H Fox  
Member

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.  
701 Pennsylvania Ave., NW, Suite 900, Washington, DC 20004 [+1.202.434.7483](tel:+12024347483)  
[RFox@mintz.com](mailto:RFox@mintz.com) | [Mintz.com](http://Mintz.com)



---

STATEMENT OF CONFIDENTIALITY:

The information contained in this electronic message and any attachments to this message are intended for the exclusive use of the addressee(s) and may contain confidential or privileged information. If you are not the intended recipient, or the person responsible for delivering the e-mail to the intended recipient, be advised you have received this message in error and that any use, dissemination, forwarding, printing, or copying is strictly prohibited. Please notify Mintz, Levin, Cohn, Ferris, Glovsky and Popeo immediately at either (617) 542-6000 or at [DirectorofIT@Mintz.com](mailto:DirectorofIT@Mintz.com), and destroy all copies of this message and any attachments. You will be reimbursed for reasonable costs incurred in notifying us.



601 Pennsylvania Ave., NW  
Suite 800  
Washington, DC 20004  
202-654-5900

March 13, 2020

**Via E-Mail**

Donald Stockdale  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington DC, 20554

**Re: Emergency Request for Special Temporary Authority**

Dear Mr. Stockdale:

T-Mobile USA, Inc. (“T-Mobile”),<sup>1/</sup> on behalf of its subsidiary, T-Mobile License, LLC and pursuant to Section 1.931 of the Commission’s rules,<sup>2/</sup> hereby requests emergency special temporary authority (“STA”) to use spectrum in the 600 MHz band for which it is not licensed. T-Mobile will use this spectrum to provide enhanced wireless broadband services for a period of sixty (60) days from Commission action to help keep Americans connected during the ongoing novel coronavirus pandemic. T-Mobile seeks Commission action as part of its Keep Americans Connected Pledge to help citizens overcome current challenges that have required them to remain socially distant.<sup>3/</sup>

***STA is in the Public Interest***

With each passing day, more Americans are being separated from each other as the United States continues to fight against the novel coronavirus. Americans have been directed to work from home and take classes remotely.<sup>4/</sup> T-Mobile can help. As the Commission is aware, T-Mobile

---

<sup>1/</sup> T-Mobile USA, Inc. is a wholly owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

<sup>2/</sup> See 47 C.F.R. § 1.931(a)(2)(iv).

<sup>3/</sup> See News Release, *Chairman Pai Launches the Keep Americans Connected Pledge*, FCC (Mar. 13, 2020), <https://docs.fcc.gov/public/attachments/DOC-363033A1.pdf>

<sup>4/</sup> See, e.g., *FCC Encouraging Staff to Telework Due to Coronavirus*, COMM. DAILY (Mar. 12, 2020); Melissa Korn, *Coronavirus Prompts Colleges to Send Students Home*, WALL STREET JOURNAL (Mar. 10, 2020), <https://www.wsj.com/articles/coronavirus-prompts-colleges-to-send-students-home-11583862936?mod=djem10point>; Ben Chapman, *New York City Shuts Two Public Schools Over*

has aggressively built out the 600 MHz spectrum for which it is authorized, delivering both Fourth Generation (“4G”) LTE and Fifth Generation (“5G”) wireless service nationwide.<sup>5/</sup> T-Mobile can even better meet the unprecedented need for our country to be connected by having access to additional 600 MHz spectrum – deploying additional capacity in areas where it has already provided, and where it soon expects to provide, service, including in rural areas. More spectrum capacity will enable Americans to even more effectively telework, engage in distance learning (including taking tests and submitting homework, projects, and other coursework), obtain medical advice through telehealth, and simply remain connected to loved ones who may be quarantined, through applications like FaceTime. And, more capacity on T-Mobile’s network will ensure that first responders and others can communicate in the event of an escalating crisis.

Accordingly, T-Mobile requests authority, for a period of sixty (60) days from Commission action, to use the spectrum listed in Exhibit A, which is currently licensed to Channel 51 License Co LLC (“Channel 51”). Channel 51 has consented to T-Mobile's use of the spectrum.<sup>6/</sup> Channel 51 is not currently using the licensed spectrum and has agreed to support T-Mobile’s temporary use of it in support of the Keep Americans Connected Pledge.

### ***Requested Rule Waivers***

T-Mobile recognizes that the Commission’s rules generally require that STA requests be submitted electronically on FCC Form 601.<sup>7/</sup> Accordingly, it hereby requests waiver of that rule. Waiver is justified because the Universal Licensing System is not optimized to allow applicants to seek permission to use 600 MHz spectrum for which an applicant is not authorized, on a temporary basis. While T-Mobile could potentially submit a request using FCC Form 601 in a paper format, doing so would elevate form over substance and potentially delay Commission

---

*Coronavirus Case*, WALL STREET JOURNAL (Mar. 12, 2020), <https://www.wsj.com/articles/new-york-city-shuts-two-public-schools-over-coronavirus-case-11584019007?mod=djem10point>.

<sup>5/</sup> See, e.g., T-Mobile News, *T-Mobile Reports Record Financials and Strong Customer Growth in FY 2019, Beating Increased Guidance While Balancing Growth and Profitability* (Feb. 6, 2020), <https://www.t-mobile.com/news/t-mobile-q4-fy19-earnings>; Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile, to Ms. Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268, *et al.*, at 1 (filed Oct. 24, 2019) (reporting that T-Mobile is proceeding on, or ahead of, the schedule the Commission established for clearing the 600 MHz band).

<sup>6/</sup> While Channel 51 and T-Mobile may have otherwise sought to permit T-Mobile’s use of the spectrum through the usual Commission leasing process, resulting in T-Mobile’s expeditious use of the spectrum, T-Mobile believes that, because of the unique nature of the 600 MHz spectrum, waiver of the rules may be required, defeating the Commission’s streamlined leasing procedures. (In particular, in order to lease the 600 MHz spectrum, T-Mobile would be required to conduct analyses under Sections 20.22(c)(2) and (3). Grant of this STA request will allow T-Mobile to use the spectrum more quickly by alleviating the need for this analysis.) The Commission will note that T-Mobile and Channel 51 have obtained authority for T-Mobile to lease *some* of the spectrum referenced in Exhibit A. This request is not intended to supersede that authority. T-Mobile has simply included all of Channel 51’s licenses in Exhibit A as a matter of administrative efficiency.

<sup>7/</sup> See 47 C.F.R. § 1.931.

action on this request.<sup>8/</sup> Seeking STA through this letter will likely permit the Commission to act more quickly, allowing T-Mobile to help bridge the connectivity gap sooner. Indeed, the Commission's rules specifically contemplate that STA requests of an urgent nature will be submitted directly to the appropriate Bureau, with the Commission subsequently billing the applicant for the required fees.<sup>9/</sup>

\* \* \* \*

T-Mobile looks forward to your prompt response. If you have any questions, please feel free to contact me directly.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey  
Vice President, Government Affairs  
Technology and Engineering Policy

#### Attachments

cc: (Electronically, with attachments)  
Charles Mathias  
Stephen Buenzow  
Sommer Gilbert  
Elizabeth Fishel  
Blaise Scinto  
Susan Mickley

---

<sup>8/</sup> Nevertheless, T-Mobile expects to submit a paper FCC Form 601 within the next ten (10) days confirming this request.

<sup>9/</sup> See 47 C.F.R. § 1.1121.

**Exhibit A**

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA010	Houston, TX	E	WRCQ549
PEA010	Houston, TX	F	WRCQ550
PEA003	Chicago, IL	E	WRCQ551
PEA003	Chicago, IL	F	WRCQ552
PEA002	Los Angeles, CA	F	WRCQ553
PEA036	New Orleans, LA	E	WRCQ554
PEA007	Boston, MA	D	WRCQ555
PEA007	Boston, MA	E	WRCQ556
PEA010	Houston, TX	E	WRCQ549
PEA010	Houston, TX	F	WRCQ550
PEA003	Chicago, IL	E	WRCQ551
PEA003	Chicago, IL	F	WRCQ552
PEA002	Los Angeles, CA	F	WRCQ553
PEA036	New Orleans, LA	E	WRCQ554
PEA007	Boston, MA	D	WRCQ555
PEA007	Boston, MA	E	WRCQ556

Elizabeth Fishel

---

From: Elizabeth Fishel  
Sent: Sunday, March 15, 2020 1:31 PM  
To: Fox, Russell; Donald Stockdale  
Cc: Blaise Scinto; Charles Mathias; Stephen Buenzow (CTR); Sommer Gilbert; Susan Mickley; Sharkey, Steve; Kung, Angela; Wieczorek, Christopher  
Subject: FW: STA Request  
Attachments: 600 MHz STA Request -- Comcast Corp. (CC Wireless Investment II, LLC).pdf

T-Mobile License LLC's request for an emergency STA to operate on the spectrum; and within the market areas that are associated with CC Wireless Investment II, LLC's (Comcast Corporation) WT (600 MHz) licenses that are identified in the attached document is granted via this email for a period of 60 days. T-Mobile License LLC must cease its operations on this spectrum if Comcast Corporation withdraws its approval for T-Mobile License LLC's use of this spectrum at any time. T-Mobile License LLC will be using this spectrum to provide relief during the state-of emergency caused by the spread of the coronavirus throughout the United States. This STA is authorized on a secondary non-interference basis. T-Mobile License LLC must cease operating on these frequencies if it causes harmful interference to any primary users. Any structure utilized to operate pursuant to this STA must comply with the height limitations specified in Section 17.7 of the Commission's rules or must be registered with the FAA. T-Mobile License LLC must file an STA application for Special Temporary Authorization to continue its operations within 10 days of today's date (March 15, 2020).

---

From: Fox, Russell <RFox@mintz.com>  
Sent: Sunday, March 15, 2020 7:42 AM  
To: Donald Stockdale <Donald.Stockdale@fcc.gov>  
Cc: Charles Mathias <Charles.Mathias@fcc.gov>; Stephen Buenzow (CTR) <Stephen.Buenzow.CTR@fcc.gov>; Sommer Gilbert <Sommer.Gilbert@fcc.gov>; Elizabeth Fishel <Elizabeth.Fishel@fcc.gov>; Blaise Scinto <Blaise.Scinto@fcc.gov>; Susan Mickley <Susan.Mickley@fcc.gov>; Sharkey, Steve <Steve.Sharkey@T-Mobile.com>; Wieczorek, Christopher <Chris.Wieczorek@T-Mobile.com>; Kung, Angela <AYKung@mintz.com>  
Subject: RE: STA Request

Three additional requests are attached.

Russell

---

From: Fox, Russell <[RFox@mintz.com](mailto:RFox@mintz.com)>  
Sent: Friday, March 13, 2020 6:53 PM  
To: [donald.stockdale@fcc.gov](mailto:donald.stockdale@fcc.gov)  
Cc: [Charles.Mathias@fcc.gov](mailto:Charles.Mathias@fcc.gov); [Stephen.Buenzow.CTR@fcc.gov](mailto:Stephen.Buenzow.CTR@fcc.gov); [Sommer.Gilbert@fcc.gov](mailto:Sommer.Gilbert@fcc.gov); [Elizabeth.Fishel@fcc.gov](mailto:Elizabeth.Fishel@fcc.gov); [Blaise.Scinto@fcc.gov](mailto:Blaise.Scinto@fcc.gov); [Susan.Mickley@fcc.gov](mailto:Susan.Mickley@fcc.gov); Sharkey, Steve <[Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com)>; Wieczorek, Christopher <[Chris.Wieczorek@T-Mobile.com](mailto:Chris.Wieczorek@T-Mobile.com)>; Kung, Angela <[AYKung@mintz.com](mailto:AYKung@mintz.com)>  
Subject: RE: STA Request

Attached are four additional requests for special temporary authority.

---

Have a good and safe weekend.

1

From: Fox, Russell  
Sent: Friday, March 13, 2020 4:21 PM  
To: 'donald.stockdale@fcc.gov' <[donald.stockdale@fcc.gov](mailto:donald.stockdale@fcc.gov)>  
Cc: 'Charles.Mathias@fcc.gov' <[Charles.Mathias@fcc.gov](mailto:Charles.Mathias@fcc.gov)>; 'Stephen.Buenzow.CTR@fcc.gov' <[Stephen.Buenzow.CTR@fcc.gov](mailto:Stephen.Buenzow.CTR@fcc.gov)>; 'Sommer.Gilbert@fcc.gov' <[Sommer.Gilbert@fcc.gov](mailto:Sommer.Gilbert@fcc.gov)>; 'Elizabeth.Fishel@fcc.gov' <[Elizabeth.Fishel@fcc.gov](mailto:Elizabeth.Fishel@fcc.gov)>; 'Blaise.Scinto@fcc.gov' <[Blaise.Scinto@fcc.gov](mailto:Blaise.Scinto@fcc.gov)>; 'Susan.Mickley@fcc.gov' <[Susan.Mickley@fcc.gov](mailto:Susan.Mickley@fcc.gov)>; Sharkey, Steve <[Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com)>; Wieczorek, Christopher <[Chris.Wieczorek@T-Mobile.com](mailto:Chris.Wieczorek@T-Mobile.com)>; Kung, Angela <[AYKung@mintz.com](mailto:AYKung@mintz.com)>  
Subject: STA Request

Mr. Stockdale:

Attached is a request for special temporary authority submitted on behalf of our client, T-Mobile USA, Inc.

If you have any questions, please contact me or T-Mobile's Steve Sharkey.

Russell H Fox  
Member

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.  
701 Pennsylvania Ave., NW, Suite 900, Washington, DC 20004 [+1.202.434.7483](tel:+12024347483)  
[RFox@mintz.com](mailto:RFox@mintz.com) | [Mintz.com](http://Mintz.com)



---

STATEMENT OF CONFIDENTIALITY:

The information contained in this electronic message and any attachments to this message are intended for the exclusive use of the addressee(s) and may contain confidential or privileged information. If you are not the intended recipient, or the person responsible for delivering the e-mail to the intended recipient, be advised you have received this message in error and that any use, dissemination, forwarding, printing, or copying is strictly prohibited. Please notify Mintz, Levin, Cohn, Ferris, Glovsky and Popeo immediately at either (617) 542-6000 or at [DirectorofIT@Mintz.com](mailto:DirectorofIT@Mintz.com), and destroy all copies of this message and any attachments. You will be reimbursed for reasonable costs incurred in notifying us.



601 Pennsylvania Ave., NW  
Suite 800  
Washington, DC 20004  
202-654-5900

March 15, 2020

***Via E-Mail***

Donald Stockdale  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington DC, 20554

**Re: Emergency Request for Special Temporary Authority**

Dear Mr. Stockdale:

T-Mobile USA, Inc. (“T-Mobile”),<sup>1/</sup> on behalf of its subsidiary, T-Mobile License, LLC and pursuant to Section 1.931 of the Commission’s rules,<sup>2/</sup> hereby requests emergency special temporary authority (“STA”) to use spectrum in the 600 MHz band for which it is not licensed. T-Mobile will use this spectrum to provide enhanced wireless broadband services for a period of sixty (60) days from Commission action to help keep Americans connected during the ongoing novel coronavirus pandemic. T-Mobile seeks Commission action as part of its Keep Americans Connected Pledge to help citizens overcome current challenges that have required them to remain socially distant.<sup>3/</sup>

***STA is in the Public Interest***

With each passing day, more Americans are being separated from each other as the United States continues to fight against the novel coronavirus. Americans have been directed to work from home and take classes remotely.<sup>4/</sup> T-Mobile can help. As the Commission is aware, T-Mobile

---

<sup>1/</sup> T-Mobile USA, Inc. is a wholly owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

<sup>2/</sup> See 47 C.F.R. § 1.931(a)(2)(iv).

<sup>3/</sup> See News Release, *Chairman Pai Launches the Keep Americans Connected Pledge*, FCC (Mar. 13, 2020), <https://docs.fcc.gov/public/attachments/DOC-363033A1.pdf>

<sup>4/</sup> See, e.g., *FCC Encouraging Staff to Telework Due to Coronavirus*, COMM. DAILY (Mar. 12, 2020); Melissa Korn, *Coronavirus Prompts Colleges to Send Students Home*, WALL STREET JOURNAL (Mar. 10, 2020), <https://www.wsj.com/articles/coronavirus-prompts-colleges-to-send-students-home-11583862936?mod=djem10point>; Ben Chapman, *New York City Shuts Two Public Schools Over*

has aggressively built out the 600 MHz spectrum for which it is authorized, delivering both Fourth Generation (“4G”) LTE and Fifth Generation (“5G”) wireless service nationwide.<sup>5/</sup> T-Mobile can even better meet the unprecedented need for our country to be connected by having access to additional 600 MHz spectrum – deploying additional capacity in areas where it has already provided, and where it soon expects to provide, service, including in rural areas. More spectrum capacity will enable Americans to even more effectively telework, engage in distance learning (including taking tests and submitting homework, projects, and other coursework), obtain medical advice through telehealth, and simply remain connected to loved ones who may be quarantined, through applications like FaceTime. And, more capacity on T-Mobile’s network will ensure that first responders and others can communicate in the event of an escalating crisis.

Accordingly, T-Mobile requests authority, for a period of sixty (60) days from Commission action, to use the spectrum listed in Exhibit A, which is currently licensed to Comcast Corporation (“Comcast”) through its subsidiary CC Wireless Investment, LLC. Comcast has consented to T-Mobile's use of the spectrum.<sup>6/</sup> Comcast is not currently using the licensed spectrum and has agreed to support T-Mobile’s temporary use of it in support of the Keep Americans Connected Pledge.

### ***Requested Rule Waivers***

T-Mobile recognizes that the Commission’s rules generally require that STA requests be submitted electronically on FCC Form 601.<sup>7/</sup> Accordingly, it hereby requests waiver of that rule. Waiver is justified because the Universal Licensing System is not optimized to allow applicants to seek permission to use 600 MHz spectrum for which an applicant is not authorized, on a temporary basis. While T-Mobile could potentially submit a request using FCC Form 601 in a paper format, doing so would elevate form over substance and potentially delay Commission action on this request.<sup>8/</sup> Seeking STA through this letter will likely permit the Commission to act

---

*Coronavirus Case*, WALL STREET JOURNAL (Mar. 12, 2020), <https://www.wsj.com/articles/new-york-city-shuts-two-public-schools-over-coronavirus-case-11584019007?mod=djem10point>.

<sup>5/</sup> See, e.g., T-Mobile News, *T-Mobile Reports Record Financials and Strong Customer Growth in FY 2019, Beating Increased Guidance While Balancing Growth and Profitability* (Feb. 6, 2020), <https://www.t-mobile.com/news/t-mobile-q4-fy19-earnings>; Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile, to Ms. Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268, *et al.*, at 1 (filed Oct. 24, 2019) (reporting that T-Mobile is proceeding on, or ahead of, the schedule the Commission established for clearing the 600 MHz band).

<sup>6/</sup> While Comcast and T-Mobile may have otherwise sought to permit T-Mobile’s use of the spectrum through the usual Commission leasing process, resulting in T-Mobile’s expeditious use of the spectrum, T-Mobile believes that, because of the unique nature of the 600 MHz spectrum, waiver of the rules may be required, defeating the Commission’s streamlined leasing procedures. (In particular, in order to lease the 600 MHz spectrum, T-Mobile would be required to conduct analyses under Sections 20.22(c)(2) and (3). Grant of this STA request will allow T-Mobile to use the spectrum more quickly by alleviating the need for this analysis.)

<sup>7/</sup> See 47 C.F.R. § 1.931.

<sup>8/</sup> Nevertheless, T-Mobile expects to submit a paper FCC Form 601 within the next ten (10) days confirming this request.

more quickly, allowing T-Mobile to help bridge the connectivity gap sooner. Indeed, the Commission's rules specifically contemplate that STA requests of an urgent nature will be submitted directly to the appropriate Bureau, with the Commission subsequently billing the applicant for the required fees.<sup>9/</sup>

\* \* \* \*

T-Mobile looks forward to your prompt response. If you have any questions, please feel free to contact me directly.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey  
Vice President, Government Affairs  
Technology and Engineering Policy

Attachments

cc: (Electronically, with attachments)  
Charles Mathias  
Stephen Buenzow  
Sommer Gilbert  
Elizabeth Fishel  
Blaise Scinto  
Susan Mickley

---

<sup>9/</sup> See 47 C.F.R. § 1.1121.

**Exhibit A**

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA003	Chicago, IL	A	WQZM792
PEA004	San Francisco, CA	A	WQZM779
PEA005	Baltimore, MD-Washington, DC	A	WQZM778
PEA007	Boston, MA	A	WQZM811
PEA009	Miami, FL	A	WQZM746
PEA010	Houston, TX	D	WQZM786
PEA011	Atlanta, GA	E	WQZM810
PEA012	Detroit, MI	E	WQZM760
PEA013	Orlando, FL	E	WQZM750
PEA016	Seattle, WA	A	WQZM776
PEA017	Minneapolis-St. Paul, MN	A	WQZM775
PEA019	Portland, OR	E	WQZM749
PEA022	Sacramento, CA	A	WQZM765
PEA023	Pittsburgh, PA	E	WQZM748
PEA027	Salt Lake City, UT	E	WQZM809
PEA029	Jacksonville, FL	E	WQZM789
PEA030	Kansas City, MO	E	WQZM758
PEA031	Indianapolis, IN	A	WQZM764
PEA032	Nashville, TN	E	WQZM793
PEA032	Nashville, TN	F	WQZM794
PEA034	Fresno, CA	E	WQZM747
PEA048	Harrisburg, PA	A	WQZM795
PEA057	Richmond, VA	E	WQZM796
PEA058	Bloomington, IN	A	WQZM784
PEA059	Memphis, TN	A	WQZM787
PEA060	Manchester, NH	A	WQZM773
PEA064	South Bend, IN	A	WQZM783
PEA065	Cape Coral, FL	A	WQZM799
PEA067	Sarasota, FL	A	WQZM798
PEA070	Eugene, OR	E	WQZM790
PEA072	Tallahassee, FL	A	WQZM797
PEA075	Albuquerque, NM	A	WQZM770
PEA083	Fort Wayne, IN	A	WQZM782
PEA090	Jackson, MS	A	WQZM769
PEA092	Decatur, IL	A	WQZM781
PEA105	Augusta, GA	A	WQZM812
PEA113	Erie, PA	A	WQZM780
PEA121	Altoona, PA	A	WQZM767
PEA124	Olympia, WA	E	WQZM772
PEA127	Evansville, IN	A	WQZM757

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA129	Springfield, IL	A	WQZM803
PEA130	Spokane, WA	A	WQZM762
PEA138	Burlington, VT	A	WQZM808
PEA147	Salisbury, MD	A	WQZM806
PEA166	Redding, CA	E	WQZM771
PEA167	Harrisonburg, VA	E	WQZM801
PEA168	Peoria, IL	A	WQZM754
PEA177	Savannah, GA	A	WQZM744
PEA184	Ruston, LA	A	WQZM763
PEA188	Jamestown, NY	A	WQZM807
PEA191	Petersburg, VA	A	WQZM743
PEA194	State College, PA	A	WQZM768
PEA197	Wheeling, WV	A	WQZM766
PEA200	Danville, VA	E	WQZM800
PEA204	Owensboro, KY	A	WQZM752
PEA237	Hinesville, GA	A	WQZM774
PEA240	Charlottesville, VA	E	WQZM802
PEA243	Paducah, KY	A	WQZM745
PEA250	Las Cruces, NM	A	WQZM751
PEA256	Lynchburg, VA	A	WQZM804
PEA263	Santa Fe, NM	A	WQZM742
PEA273	Bloomington, IL	A	WQZM813
PEA282	Galesburg, IL	A	WQZM753
PEA292	Pueblo, CO	A	WQZM788
PEA312	Farmington, NM	E	WQZM756
PEA323	Socorro, NM	A	WQZM741
PEA330	Olney, IL	A	WQZM791
PEA353	Watseka, IL	A	WQZM785
PEA378	Waynesboro, GA	A	WQZM805
PEA386	Barnwell, SC	E	WQZM755

Elizabeth Fishel

---

From: Elizabeth Fishel  
Sent: Sunday, March 15, 2020 12:34 PM  
To: Fox, Russell; Donald Stockdale  
Cc: Charles Mathias; Stephen Buenzow (CTR); Sommer Gilbert; Blaise Scinto; Susan Mickley; Sharkey, Steve; Wieczorek, Christopher; Kung, Angela; Donald Stockdale  
Subject: RE: STA Request  
Attachments: T-Mobile's 600 MHz STA Request -- DISH (ParkerB.com Wireless L.L.C.).pdf; DISH 600 MHz Letter.pdf

T-Mobile License LLC's request for an emergency STA to operate on the spectrum; and within the market areas associated with ParkerB.com Wireless L.L.C.'s (Dish Network Corporation) 486 WT (600 MHz) licenses has been granted via this email for a period of 60 days. T-Mobile License LLC must cease its operations on this spectrum if Dish Network Corporation withdraws its approval for T-Mobile License LLC's use of this spectrum at any time. T-Mobile License LLC will be using this spectrum to provide relief during the state-of emergency caused by the spread of the coronavirus throughout the United States. This STA is authorized on a secondary non-interference basis. T-Mobile License LLC must cease operating on these frequencies if it causes harmful interference to any primary users. Any structure utilized to operate pursuant to this STA must comply with the height limitations specified in Section 17.7 of the Commission's rules or must be registered with the FAA. T-Mobile License LLC must file an STA application for Special Temporary Authorization to continue its operations within 10 days of today's date (March 15, 2020).

---

From: Fox, Russell <[RFox@mintz.com](mailto:RFox@mintz.com)>  
Sent: Sunday, March 15, 2020 7:42 AM  
To: Donald Stockdale <[Donald.Stockdale@fcc.gov](mailto:Donald.Stockdale@fcc.gov)>  
Cc: Charles Mathias <[Charles.Mathias@fcc.gov](mailto:Charles.Mathias@fcc.gov)>; Stephen Buenzow (CTR) <[Stephen.Buenzow.CTR@fcc.gov](mailto:Stephen.Buenzow.CTR@fcc.gov)>; Sommer Gilbert <[Sommer.Gilbert@fcc.gov](mailto:Sommer.Gilbert@fcc.gov)>; Elizabeth Fishel <[Elizabeth.Fishel@fcc.gov](mailto:Elizabeth.Fishel@fcc.gov)>; Blaise Scinto <[Blaise.Scinto@fcc.gov](mailto:Blaise.Scinto@fcc.gov)>; Susan Mickley <[Susan.Mickley@fcc.gov](mailto:Susan.Mickley@fcc.gov)>; Sharkey, Steve <[Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com)>; Wieczorek, Christopher <[Chris.Wieczorek@T-Mobile.com](mailto:Chris.Wieczorek@T-Mobile.com)>; Kung, Angela <[AYKung@mintz.com](mailto:AYKung@mintz.com)>  
Subject: RE: STA Request

Three additional requests are attached.

Russell

---

From: Fox, Russell <[RFox@mintz.com](mailto:RFox@mintz.com)>  
Sent: Friday, March 13, 2020 6:53 PM  
To: [donald.stockdale@fcc.gov](mailto:donald.stockdale@fcc.gov)  
Cc: [Charles.Mathias@fcc.gov](mailto:Charles.Mathias@fcc.gov); [Stephen.Buenzow.CTR@fcc.gov](mailto:Stephen.Buenzow.CTR@fcc.gov); [Sommer.Gilbert@fcc.gov](mailto:Sommer.Gilbert@fcc.gov); [Elizabeth.Fishel@fcc.gov](mailto:Elizabeth.Fishel@fcc.gov); [Blaise.Scinto@fcc.gov](mailto:Blaise.Scinto@fcc.gov); [Susan.Mickley@fcc.gov](mailto:Susan.Mickley@fcc.gov); Sharkey, Steve <[Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com)>; Wieczorek, Christopher <[Chris.Wieczorek@T-Mobile.com](mailto:Chris.Wieczorek@T-Mobile.com)>; Kung, Angela <[AYKung@mintz.com](mailto:AYKung@mintz.com)>  
Subject: RE: STA Request

Attached are four additional requests for special temporary authority.

---

Have a good and safe weekend.

1

From: Fox, Russell  
Sent: Friday, March 13, 2020 4:21 PM  
To: 'donald.stockdale@fcc.gov' <[donald.stockdale@fcc.gov](mailto:donald.stockdale@fcc.gov)>  
Cc: 'Charles.Mathias@fcc.gov' <[Charles.Mathias@fcc.gov](mailto:Charles.Mathias@fcc.gov)>; 'Stephen.Buenzow.CTR@fcc.gov' <[Stephen.Buenzow.CTR@fcc.gov](mailto:Stephen.Buenzow.CTR@fcc.gov)>; 'Sommer.Gilbert@fcc.gov' <[Sommer.Gilbert@fcc.gov](mailto:Sommer.Gilbert@fcc.gov)>; 'Elizabeth.Fishel@fcc.gov' <[Elizabeth.Fishel@fcc.gov](mailto:Elizabeth.Fishel@fcc.gov)>; 'Blaise.Scinto@fcc.gov' <[Blaise.Scinto@fcc.gov](mailto:Blaise.Scinto@fcc.gov)>; 'Susan.Mickley@fcc.gov' <[Susan.Mickley@fcc.gov](mailto:Susan.Mickley@fcc.gov)>; Sharkey, Steve <[Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com)>; Wieczorek, Christopher <[Chris.Wieczorek@T-Mobile.com](mailto:Chris.Wieczorek@T-Mobile.com)>; Kung, Angela <[AYKung@mintz.com](mailto:AYKung@mintz.com)>  
Subject: STA Request

Mr. Stockdale:

Attached is a request for special temporary authority submitted on behalf of our client, T-Mobile USA, Inc.

If you have any questions, please contact me or T-Mobile's Steve Sharkey.

Russell H Fox  
Member

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.  
701 Pennsylvania Ave., NW, Suite 900, Washington, DC 20004 [+1.202.434.7483](tel:+12024347483)  
[RFox@mintz.com](mailto:RFox@mintz.com) | [Mintz.com](http://Mintz.com)



---

STATEMENT OF CONFIDENTIALITY:

The information contained in this electronic message and any attachments to this message are intended for the exclusive use of the addressee(s) and may contain confidential or privileged information. If you are not the intended recipient, or the person responsible for delivering the e-mail to the intended recipient, be advised you have received this message in error and that any use, dissemination, forwarding, printing, or copying is strictly prohibited. Please notify Mintz, Levin, Cohn, Ferris, Glovsky and Popeo immediately at either (617) 542-6000 or at [DirectorofIT@Mintz.com](mailto:DirectorofIT@Mintz.com), and destroy all copies of this message and any attachments. You will be reimbursed for reasonable costs incurred in notifying us.



601 Pennsylvania Ave., NW  
Suite 800  
Washington, DC 20004  
202-654-5900

March 13, 2020

**Via E-Mail**

Donald Stockdale  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington DC, 20554

**Re: Emergency Request for Special Temporary Authority**

Dear Mr. Stockdale:

T-Mobile USA, Inc. (“T-Mobile”),<sup>1/</sup> on behalf of its subsidiary, T-Mobile License, LLC and pursuant to Section 1.931 of the Commission’s rules,<sup>2/</sup> hereby requests emergency special temporary authority (“STA”) to use spectrum in the 600 MHz band for which it is not licensed. T-Mobile will use this spectrum to provide enhanced wireless broadband services for a period of sixty (60) days from Commission action to help keep Americans connected during the ongoing novel coronavirus pandemic. T-Mobile seeks Commission action as part of its Keep Americans Connected Pledge to help citizens overcome current challenges that have required them to remain socially distant.<sup>3/</sup>

***STA is in the Public Interest***

With each passing day, more Americans are being separated from each other as the United States continues to fight against the novel coronavirus. Americans have been directed to work from home and take classes remotely.<sup>4/</sup> T-Mobile can help. As the Commission is aware, T-Mobile

---

<sup>1/</sup> T-Mobile USA, Inc. is a wholly owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

<sup>2/</sup> See 47 C.F.R. § 1.931(a)(2)(iv).

<sup>3/</sup> See News Release, *Chairman Pai Launches the Keep Americans Connected Pledge*, FCC (Mar. 13, 2020), <https://docs.fcc.gov/public/attachments/DOC-363033A1.pdf>

<sup>4/</sup> See, e.g., *FCC Encouraging Staff to Telework Due to Coronavirus*, COMM. DAILY (Mar. 12, 2020); Melissa Korn, *Coronavirus Prompts Colleges to Send Students Home*, WALL STREET JOURNAL (Mar. 10, 2020), <https://www.wsj.com/articles/coronavirus-prompts-colleges-to-send-students-home-11583862936?mod=djem10point>; Ben Chapman, *New York City Shuts Two Public Schools Over*

has aggressively built out the 600 MHz spectrum for which it is authorized, delivering both Fourth Generation (“4G”) LTE and Fifth Generation (“5G”) wireless service nationwide.<sup>5/</sup> T-Mobile can even better meet the unprecedented need for our country to be connected by having access to additional 600 MHz spectrum – deploying additional capacity in areas where it has already provided, and where it soon expects to provide, service, including in rural areas. More spectrum capacity will enable Americans to even more effectively telework, engage in distance learning (including taking tests and submitting homework, projects, and other coursework), obtain medical advice through telehealth, and simply remain connected to loved ones who may be quarantined, through applications like FaceTime. And, more capacity on T-Mobile’s network will ensure that first responders and others can communicate in the event of an escalating crisis.

Accordingly, T-Mobile requests authority, for a period of sixty (60) days from Commission action, to use the spectrum listed in Exhibit A, which is currently licensed to DISH Network Corporation (“DISH”) through its subsidiary ParkerB.com Wireless L.L.C. DISH has consented to T-Mobile’s use of the spectrum.<sup>6/</sup> DISH is not currently using the licensed spectrum and has agreed to support T-Mobile’s temporary use of it in support of the Keep Americans Connected Pledge.

### ***Requested Rule Waivers***

T-Mobile recognizes that the Commission’s rules generally require that STA requests be submitted electronically on FCC Form 601.<sup>7/</sup> Accordingly, it hereby requests waiver of that rule. Waiver is justified because the Universal Licensing System is not optimized to allow applicants to seek permission to use 600 MHz spectrum for which an applicant is not authorized, on a temporary basis. While T-Mobile could potentially submit a request using FCC Form 601 in a paper format, doing so would elevate form over substance and potentially delay Commission action on this request.<sup>8/</sup> Seeking STA through this letter will likely permit the Commission to act

---

*Coronavirus Case*, WALL STREET JOURNAL (Mar. 12, 2020), <https://www.wsj.com/articles/new-york-city-shuts-two-public-schools-over-coronavirus-case-11584019007?mod=djem10point>.

<sup>5/</sup> See, e.g., T-Mobile News, *T-Mobile Reports Record Financials and Strong Customer Growth in FY 2019, Beating Increased Guidance While Balancing Growth and Profitability* (Feb. 6, 2020), <https://www.t-mobile.com/news/t-mobile-q4-fy19-earnings>; Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile, to Ms. Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268, *et al.*, at 1 (filed Oct. 24, 2019) (reporting that T-Mobile is proceeding on, or ahead of, the schedule the Commission established for clearing the 600 MHz band).

<sup>6/</sup> While DISH and T-Mobile may have otherwise sought to permit T-Mobile’s use of the spectrum through the usual Commission leasing process, resulting in T-Mobile’s expeditious use of the spectrum, T-Mobile believes that, because of the unique nature of the 600 MHz spectrum, waiver of the rules may be required, defeating the Commission’s streamlined leasing procedures. (In particular, in order to lease the 600 MHz spectrum, T-Mobile would be required to conduct analyses under Sections 20.22(c)(2) and (3). Grant of this STA request will allow T-Mobile to use the spectrum more quickly by alleviating the need for this analysis.)

<sup>7/</sup> See 47 C.F.R. § 1.931.

<sup>8/</sup> Nevertheless, T-Mobile expects to submit a paper FCC Form 601 within the next ten (10) days confirming this request.

more quickly, allowing T-Mobile to help bridge the connectivity gap sooner. Indeed, the Commission's rules specifically contemplate that STA requests of an urgent nature will be submitted directly to the appropriate Bureau, with the Commission subsequently billing the applicant for the required fees.<sup>9/</sup>

\* \* \* \*

T-Mobile looks forward to your prompt response. If you have any questions, please feel free to contact me directly.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey  
Vice President, Government Affairs  
Technology and Engineering Policy

#### Attachments

cc: (Electronically, with attachments)  
Charles Mathias  
Stephen Buenzow  
Sommer Gilbert  
Elizabeth Fishel  
Blaise Scinto  
Susan Mickley

---

<sup>9/</sup> See 47 C.F.R. § 1.1121.

**Exhibit A**

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA026	Las Vegas, NV	F	WQZM232
PEA026	Las Vegas, NV	G	WQZM233
PEA362	Payette, ID	A	WQZM234
PEA148	Bellingham, WA	A	WQZM235
PEA195	Lewiston, ID	A	WQZM236
PEA237	Hinesville, GA	F	WQZM237
PEA215	Hickory, NC	F	WQZM238
PEA410	Valentine, NE	A	WQZM239
PEA254	Merrill, WI	F	WQZM240
PEA185	Marquette, MI	F	WQZM241
PEA137	Eau Claire, WI	F	WQZM242
PEA074	Chattanooga, TN	F	WQZM243
PEA009	Miami, FL	E	WQZM244
PEA009	Miami, FL	F	WQZM245
PEA009	Miami, FL	G	WQZM246
PEA335	Natchitoches, LA	F	WQZM247
PEA404	Kanab, UT	E	WQZM248
PEA285	Gallup, NM	E	WQZM249
PEA392	Maryville, MO	F	WQZM250
PEA412	Puerto Rico	A	WQZM251
PEA412	Puerto Rico	B	WQZM252
PEA038	Milwaukee, WI	G	WQZM253
PEA386	Barnwell, SC	F	WQZM254
PEA029	Jacksonville, FL	F	WQZM255
PEA382	Riverton, WY	F	WQZM256
PEA343	Pecos, TX	F	WQZM257
PEA261	Fargo, ND	A	WQZM258
PEA226	Lima, OH	A	WQZM259
PEA336	Grand Forks, ND	F	WQZM260
PEA390	Snyder, TX	A	WQZM261
PEA408	Ballinger, TX	A	WQZM262
PEA363	Big Spring, TX	A	WQZM263
PEA402	Brady, TX	A	WQZM264
PEA288	Abilene, TX	A	WQZM265
PEA320	San Angelo, TX	A	WQZM266
PEA247	Nampa, ID	G	WQZM267
PEA156	Boise City, ID	G	WQZM268
PEA046	Little Rock, AR	F	WQZM269
PEA046	Little Rock, AR	G	WQZM270
PEA297	Pendleton, OR	A	WQZM271

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA206	Wenatchee, WA	A	WQZM272
PEA119	Yakima, WA	A	WQZM273
PEA107	Bangor, ME	B	WQZM274
PEA127	Evansville, IN	G	WQZM275
PEA323	Socorro, NM	F	WQZM276
PEA263	Santa Fe, NM	F	WQZM277
PEA345	Newberry, SC	A	WQZM278
PEA327	Orangeburg, SC	A	WQZM279
PEA284	Greenwood, SC	A	WQZM280
PEA332	Bennettsville, SC	A	WQZM281
PEA188	Jamestown, NY	G	WQZM282
PEA138	Burlington, VT	G	WQZM283
PEA319	Albany, GA	F	WQZM284
PEA371	Wytheville, VA	A	WQZM285
PEA230	Lumberton, NC	A	WQZM286
PEA291	Rockingham, NC	A	WQZM287
PEA309	Elizabeth City, NC	A	WQZM288
PEA228	Roanoke, VA	A	WQZM289
PEA131	Sanford, NC	A	WQZM290
PEA169	Goldsboro, NC	A	WQZM291
PEA146	Wilmington, NC	A	WQZM292
PEA305	Altus, OK	A	WQZM293
PEA302	Enid, OK	A	WQZM294
PEA251	Salina, KS	A	WQZM295
PEA277	Hutchinson, KS	A	WQZM296
PEA070	Eugene, OR	A	WQZM297
PEA403	Lewistown, MT	A	WQZM298
PEA334	Pampa, TX	F	WQZM299
PEA411	Van Horn, TX	F	WQZM300
PEA048	Harrisburg, PA	G	WQZM301
PEA084	Mobile, AL	A	WQZM302
PEA027	Salt Lake City, UT	F	WQZM303
PEA027	Salt Lake City, UT	G	WQZM304
PEA011	Atlanta, GA	F	WQZM305
PEA011	Atlanta, GA	G	WQZM306
PEA132	Corpus Christi, TX	F	WQZM307
PEA409	Haskell, TX	A	WQZM308
PEA400	Muleshoe, TX	A	WQZM309
PEA401	Floydada, TX	A	WQZM310
PEA376	Hereford, TX	A	WQZM311
PEA355	Casper, WY	A	WQZM312
PEA346	Franklin, NC	A	WQZM313

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA233	Shelby, NC	A	WQZM314
PEA208	Salisbury, NC	A	WQZM315
PEA207	Brunswick, GA	F	WQZM316
PEA008	Dallas, TX	F	WQZM317
PEA008	Dallas, TX	G	WQZM318
PEA004	San Francisco, CA	E	WQZM319
PEA004	San Francisco, CA	F	WQZM320
PEA004	San Francisco, CA	G	WQZM321
PEA010	Houston, TX	G	WQZM322
PEA416	Gulf of Mexico	D	WQZM323
PEA416	Gulf of Mexico	E	WQZM324
PEA396	Winterset, IA	A	WQZM325
PEA370	Washington, IA	A	WQZM326
PEA265	Winona, MN	A	WQZM327
PEA354	New London, WI	A	WQZM328
PEA253	Baraboo, WI	A	WQZM329
PEA269	Racine, WI	A	WQZM330
PEA268	Clinton, IA	A	WQZM331
PEA218	Wausau, WI	A	WQZM332
PEA294	Waterloo, IA	A	WQZM333
PEA267	Sheboygan, WI	A	WQZM334
PEA252	Sioux City, IA	A	WQZM335
PEA209	Green Bay, WI	A	WQZM336
PEA176	Ames, IA	A	WQZM337
PEA163	Davenport, IA	A	WQZM338
PEA225	La Crosse, WI	A	WQZM339
PEA223	Dubuque, IA	A	WQZM340
PEA179	Burlington, IA	A	WQZM341
PEA155	Appleton, WI	A	WQZM342
PEA182	Cedar Rapids, IA	A	WQZM343
PEA122	Madison, WI	A	WQZM344
PEA219	Mason City, IA	A	WQZM345
PEA153	Fond du Lac, WI	A	WQZM346
PEA159	Valdosta, GA	F	WQZM347
PEA197	Wheeling, WV	G	WQZM348
PEA121	Altoona, PA	G	WQZM349
PEA194	State College, PA	G	WQZM350
PEA387	Wahpeton, ND	F	WQZM351
PEA270	Ottawa, IL	A	WQZM352
PEA118	Richmond, IN	A	WQZM353
PEA143	Keene, NH	E	WQZM354
PEA407	Salmon, ID	F	WQZM355

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA324	Honesdale, PA	A	WQZM356
PEA136	Williamsport, PA	A	WQZM357
PEA241	Dublin, GA	A	WQZM358
PEA298	Fairbanks, AK	C	WQZM359
PEA298	Fairbanks, AK	D	WQZM360
PEA298	Fairbanks, AK	E	WQZM361
PEA264	Kodiak, AK	C	WQZM362
PEA264	Kodiak, AK	D	WQZM363
PEA264	Kodiak, AK	E	WQZM364
PEA406	Anamosa, IA	E	WQZM365
PEA322	Minot, ND	A	WQZM366
PEA318	Thief River Falls, MN	F	WQZM367
PEA274	Twin Falls, ID	A	WQZM368
PEA187	Pocatello, ID	A	WQZM369
PEA279	Logan, UT	A	WQZM370
PEA158	Helena, MT	A	WQZM371
PEA068	Grand Rapids, MI	G	WQZM372
PEA056	Kalamazoo, MI	G	WQZM373
PEA061	Toledo, OH	G	WQZM374
PEA315	Sheridan, WY	F	WQZM375
PEA348	Aberdeen, SD	F	WQZM376
PEA129	Springfield, IL	G	WQZM377
PEA256	Lynchburg, VA	F	WQZM378
PEA256	Lynchburg, VA	G	WQZM379
PEA378	Waynesboro, GA	F	WQZM380
PEA378	Waynesboro, GA	G	WQZM381
PEA147	Salisbury, MD	F	WQZM382
PEA147	Salisbury, MD	G	WQZM383
PEA260	Alpena, MI	F	WQZM384
PEA203	Traverse City, MI	F	WQZM385
PEA338	Durango, CO	A	WQZM386
PEA178	Sedalia, MO	A	WQZM387
PEA178	Sedalia, MO	B	WQZM388
PEA101	Wichita, KS	A	WQZM389
PEA073	El Paso, TX	A	WQZM390
PEA031	Indianapolis, IN	D	WQZM391
PEA031	Indianapolis, IN	E	WQZM392
PEA022	Sacramento, CA	D	WQZM393
PEA022	Sacramento, CA	E	WQZM394
PEA398	South Sioux City, NE	E	WQZM395
PEA075	Albuquerque, NM	F	WQZM396
PEA414	US Virgin Islands	C	WQZM397

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA001	New York, NY	D	WQZM398
PEA001	New York, NY	E	WQZM399
PEA001	New York, NY	F	WQZM400
PEA001	New York, NY	G	WQZM401
PEA357	Espanola, NM	A	WQZM402
PEA180	Flagstaff, AZ	A	WQZM403
PEA308	Americus, GA	G	WQZM404
PEA262	Hilton Head Island, SC	G	WQZM405
PEA128	Macon, GA	G	WQZM406
PEA151	Winston-Salem, NC	G	WQZM407
PEA384	Manchester, IA	E	WQZM408
PEA042	Honolulu, HI	F	WQZM409
PEA042	Honolulu, HI	G	WQZM410
PEA032	Nashville, TN	A	WQZM411
PEA032	Nashville, TN	B	WQZM412
PEA340	Clovis, NM	A	WQZM413
PEA259	Roswell, NM	A	WQZM414
PEA211	Ardmore, OK	E	WQZM415
PEA266	Lenoir, NC	E	WQZM416
PEA018	San Diego, CA	F	WQZM417
PEA018	San Diego, CA	G	WQZM418
PEA286	Sioux Falls, SD	A	WQZM419
PEA289	Price, UT	A	WQZM420
PEA047	Brownsville, TX	A	WQZM421
PEA053	Tucson, AZ	A	WQZM422
PEA017	Minneapolis-St. Paul, MN	F	WQZM423
PEA017	Minneapolis-St. Paul, MN	G	WQZM424
PEA016	Seattle, WA	F	WQZM425
PEA016	Seattle, WA	G	WQZM426
PEA006	Philadelphia, PA	F	WQZM427
PEA006	Philadelphia, PA	G	WQZM428
PEA005	Baltimore, MD-Washington, DC	F	WQZM429
PEA005	Baltimore, MD-Washington, DC	G	WQZM430
PEA280	Garden City, KS	A	WQZM431
PEA339	Scottsbluff, NE	G	WQZM432
PEA331	Plainview, TX	F	WQZM433
PEA276	Rapid City, SD	A	WQZM434
PEA383	Creston, IA	A	WQZM435
PEA036	New Orleans, LA	F	WQZM436
PEA040	Birmingham, AL	F	WQZM437
PEA040	Birmingham, AL	G	WQZM438
PEA248	Sumter, SC	A	WQZM439

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA134	Newark, OH	A	WQZM440
PEA141	Brainerd, MN	A	WQZM441
PEA051	Louisville, KY	F	WQZM442
PEA051	Louisville, KY	G	WQZM443
PEA342	Mitchell, SD	F	WQZM444
PEA044	Rochester, NY	F	WQZM445
PEA044	Rochester, NY	G	WQZM446
PEA060	Manchester, NH	G	WQZM447
PEA060	Manchester, NH	F	WQZM448
PEA069	Springfield, MA	G	WQZM449
PEA391	Ontario, OR	E	WQZM450
PEA379	Sault Ste. Marie, MI	C	WQZM451
PEA380	Escanaba, MI	C	WQZM452
PEA395	Jamestown, ND	A	WQZM453
PEA072	Tallahassee, FL	G	WQZM454
PEA067	Sarasota, FL	G	WQZM455
PEA065	Cape Coral, FL	G	WQZM456
PEA002	Los Angeles, CA	A	WQZM457
PEA002	Los Angeles, CA	B	WQZM458
PEA258	Cullman, AL	F	WQZM459
PEA170	Dothan, AL	F	WQZM460
PEA139	Hot Springs, AR	F	WQZM461
PEA034	Fresno, CA	F	WQZM462
PEA034	Fresno, CA	G	WQZM463
PEA023	Pittsburgh, PA	F	WQZM464
PEA023	Pittsburgh, PA	G	WQZM465
PEA019	Portland, OR	F	WQZM466
PEA019	Portland, OR	G	WQZM467
PEA013	Orlando, FL	F	WQZM468
PEA013	Orlando, FL	G	WQZM469
PEA204	Owensboro, KY	F	WQZM470
PEA234	Lexington, NC	F	WQZM471
PEA003	Chicago, IL	G	WQZM472
PEA292	Pueblo, CO	F	WQZM473
PEA304	Mount Airy, NC	E	WQZM474
PEA076	Reno, NV	F	WQZM475
PEA105	Augusta, GA	F	WQZM476
PEA117	La Grange, GA	A	WQZM477
PEA071	Knoxville, TN	A	WQZM478
PEA394	Martin, SD	F	WQZM479
PEA351	Dickinson, ND	F	WQZM480
PEA162	Elizabethtown, KY	F	WQZM481

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA081	Saginaw, MI	G	WQZM482
PEA081	Saginaw, MI	F	WQZM483
PEA326	Fergus Falls, MN	F	WQZM484
PEA112	Bowling Green, KY	F	WQZM485
PEA077	Portland, ME	A	WQZM486
PEA287	Kenosha, WI	A	WQZM487
PEA224	De Kalb, IL	A	WQZM488
PEA186	Rock Hill, SC	A	WQZM489
PEA193	Saint Joseph, MO	G	WQZM490
PEA193	Saint Joseph, MO	F	WQZM491
PEA250	Las Cruces, NM	F	WQZM492
PEA066	Lansing, MI	F	WQZM493
PEA066	Lansing, MI	G	WQZM494
PEA333	Sidney, OH	F	WQZM495
PEA321	Batesville, IN	F	WQZM496
PEA123	Mansfield, OH	F	WQZM497
PEA368	Concordia, KS	E	WQZM498
PEA296	Pottsville, PA	A	WQZM499
PEA290	Watertown, SD	F	WQZM500
PEA290	Watertown, SD	G	WQZM501
PEA037	Columbus, OH	F	WQZM502
PEA037	Columbus, OH	G	WQZM503
PEA361	Richfield, UT	F	WQZM504
PEA303	Great Falls, MT	A	WQZM505
PEA140	Fredericksburg, VA	F	WQZM506
PEA140	Fredericksburg, VA	G	WQZM507
PEA063	Tulsa, OK	G	WQZM508
PEA413	Guam-Northern Mariana Islands	G	WQZM509
PEA102	Grand Junction, CO	F	WQZM510
PEA316	Rock Springs, WY	A	WQZM511
PEA366	Pullman, WA	G	WQZM512
PEA366	Pullman, WA	F	WQZM513
PEA353	Watseka, IL	F	WQZM514
PEA113	Erie, PA	G	WQZM515
PEA092	Decatur, IL	G	WQZM516
PEA083	Fort Wayne, IN	G	WQZM517
PEA064	South Bend, IN	G	WQZM518
PEA058	Bloomington, IN	G	WQZM519
PEA089	Columbia, SC	F	WQZM520
PEA015	Phoenix, AZ	F	WQZM521
PEA015	Phoenix, AZ	G	WQZM522
PEA347	New Roads, LA	A	WQZM523

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA350	Forrest City, AR	A	WQZM524
PEA293	Lawrenceburg, TN	A	WQZM525
PEA310	Farmington, MO	A	WQZM526
PEA196	Cape Girardeau, MO	A	WQZM527
PEA145	Columbia, TN	A	WQZM528
PEA174	Springfield, MO	A	WQZM529
PEA161	Carbondale, IL	A	WQZM530
PEA125	Alton, IL	A	WQZM531
PEA273	Bloomington, IL	G	WQZM532
PEA329	Kingsville, TX	F	WQZM533
PEA385	Hannibal, MO	E	WQZM534
PEA255	Greenville, MS	A	WQZM535
PEA149	Biloxi, MS	A	WQZM536
PEA175	Southaven, MS	A	WQZM537
PEA030	Kansas City, MO	F	WQZM538
PEA030	Kansas City, MO	G	WQZM539
PEA020	Denver, CO	F	WQZM540
PEA020	Denver, CO	G	WQZM541
PEA012	Detroit, MI	F	WQZM542
PEA012	Detroit, MI	G	WQZM543
PEA393	Macon, MO	E	WQZM544
PEA367	Moberly, MO	E	WQZM545
PEA098	Johnson City, TN	G	WQZM546
PEA055	Huntsville, AL	G	WQZM547
PEA399	Lampasas, TX	A	WQZM548
PEA375	Deming, NM	A	WQZM549
PEA352	Gonzales, TX	A	WQZM550
PEA358	Marble Falls, TX	A	WQZM551
PEA337	Mineral Wells, TX	A	WQZM552
PEA314	Jacksonville, TX	A	WQZM553
PEA313	Lockhart, TX	A	WQZM554
PEA275	Corsicana, TX	A	WQZM555
PEA272	Brownwood, TX	A	WQZM556
PEA221	Laredo, TX	A	WQZM557
PEA201	Eagle Pass, TX	A	WQZM558
PEA160	Victoria, TX	A	WQZM559
PEA126	Casa Grande, AZ	A	WQZM560
PEA133	Nacogdoches, TX	A	WQZM561
PEA152	Tyler, TX	A	WQZM562
PEA144	Paris, TX	A	WQZM563
PEA096	Richmond, KY	G	WQZM564
PEA021	Tampa, FL	F	WQZM565

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA021	Tampa, FL	G	WQZM566
PEA110	Jackson, TN	A	WQZM567
PEA243	Paducah, KY	F	WQZM568
PEA078	Greensboro, NC	G	WQZM569
PEA085	Charleston, SC	G	WQZM570
PEA045	Raleigh, NC	G	WQZM571
PEA093	Lafayette, LA	A	WQZM572
PEA111	Fayetteville, AR	A	WQZM573
PEA086	Frankfort, KY	A	WQZM574
PEA082	Baton Rouge, LA	A	WQZM575
PEA091	Colorado Springs, CO	G	WQZM576
PEA090	Jackson, MS	F	WQZM577
PEA397	Aliceville, AL	G	WQZM578
PEA397	Aliceville, AL	F	WQZM579
PEA108	Des Moines, IA	A	WQZM580
PEA239	Kannapolis, NC	F	WQZM581
PEA049	Albany, NY	A	WQZM582
PEA041	Syracuse, NY	A	WQZM583
PEA271	Elmira, NY	F	WQZM584
PEA271	Elmira, NY	G	WQZM585
PEA094	Waco, TX	F	WQZM586
PEA330	Olney, IL	F	WQZM587
PEA238	Florence, SC	A	WQZM588
PEA154	Myrtle Beach, SC	A	WQZM589
PEA389	McCook, NE	A	WQZM590
PEA171	Fort Smith, AR	E	WQZM591
PEA062	Dayton, OH	F	WQZM592
PEA282	Galesburg, IL	E	WQZM593
PEA168	Peoria, IL	E	WQZM594
PEA198	Jonesboro, AR	A	WQZM595
PEA216	Joplin, MO	A	WQZM596
PEA232	Topeka, KS	A	WQZM597
PEA164	Montgomery, AL	A	WQZM598
PEA245	West Plains, MO	A	WQZM599
PEA299	Kirksville, MO	A	WQZM600
PEA183	Columbia, MO	A	WQZM601
PEA150	Rolla, MO	A	WQZM602
PEA222	Morristown, TN	A	WQZM603
PEA244	Manhattan, KS	A	WQZM604
PEA079	Hattiesburg, MS	A	WQZM605
PEA099	Tupelo, MS	A	WQZM606
PEA415	American Samoa	F	WQZM607

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA415	American Samoa	G	WQZM608
PEA312	Farmington, NM	F	WQZM609
PEA033	Virginia Beach, VA	G	WQZM610
PEA033	Virginia Beach, VA	F	WQZM611
PEA039	Oklahoma City, OK	F	WQZM612
PEA039	Oklahoma City, OK	G	WQZM613
PEA025	Cincinnati, OH	F	WQZM614
PEA025	Cincinnati, OH	G	WQZM615
PEA035	Austin, TX	G	WQZM616
PEA035	Austin, TX	F	WQZM617
PEA014	Cleveland, OH	F	WQZM618
PEA014	Cleveland, OH	G	WQZM619
PEA142	Merced, CA	F	WQZM620
PEA142	Merced, CA	G	WQZM621
PEA157	Yuma, AZ	F	WQZM622
PEA157	Yuma, AZ	G	WQZM623
PEA088	Frederick, MD	A	WQZM624
PEA088	Frederick, MD	B	WQZM625
PEA028	San Antonio, TX	F	WQZM626
PEA028	San Antonio, TX	G	WQZM627
PEA181	Texarkana, TX	A	WQZM628
PEA050	Greenville, SC	F	WQZM629
PEA043	Charlotte, NC	F	WQZM630
PEA007	Boston, MA	F	WQZM631
PEA007	Boston, MA	G	WQZM632
PEA325	Bismarck, ND	F	WQZM633
PEA388	Atlantic, IA	A	WQZM634
PEA374	North Platte, NE	A	WQZM635
PEA295	Stillwater, OK	A	WQZM636
PEA306	Wichita Falls, TX	A	WQZM637
PEA231	Fremont, NE	A	WQZM638
PEA365	Vernon, TX	A	WQZM639
PEA236	Grand Island, NE	A	WQZM640
PEA281	Muskogee, OK	A	WQZM641
PEA214	Lincoln, NE	A	WQZM642
PEA278	Bartlesville, OK	A	WQZM643
PEA114	Morgantown, WV	A	WQZM644
PEA116	Rockford, IL	A	WQZM645
PEA080	Omaha, NE	A	WQZM646
PEA057	Richmond, VA	G	WQZM647
PEA199	Dalton, GA	A	WQZM648
PEA165	Rome, GA	A	WQZM649

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA054	Buffalo, NY	G	WQZM650
PEA200	Danville, VA	A	WQZM651
PEA240	Charlottesville, VA	A	WQZM652
PEA167	Harrisonburg, VA	A	WQZM653
PEA349	Marion, NC	E	WQZM654
PEA205	Douglas City, CA	A	WQZM655
PEA213	Bend, OR	A	WQZM656
PEA364	Butte, MT	A	WQZM657
PEA373	Walla Walla, WA	A	WQZM658
PEA405	Jackson, WY	A	WQZM659
PEA190	Bozeman, MT	A	WQZM660
PEA369	Red Oak, IA	A	WQZM661
PEA172	Duluth, MN	F	WQZM662
PEA172	Duluth, MN	G	WQZM663
PEA307	Yankton, SD	E	WQZM664
PEA106	Zanesville, OH	A	WQZM665
PEA097	Mankato, MN	A	WQZM666
PEA052	Charleston, WV	A	WQZM667
PEA059	Memphis, TN	F	WQZM668
PEA377	Demopolis, AL	A	WQZM669
PEA344	Clanton, AL	A	WQZM670
PEA300	Selma, AL	A	WQZM671
PEA311	Trinidad, CO	A	WQZM672
PEA372	Colby, KS	A	WQZM673
PEA359	Sterling, CO	A	WQZM674
PEA115	Asheville, NC	E	WQZM675
PEA360	Juneau, AK	D	WQZM676
PEA360	Juneau, AK	E	WQZM677
PEA212	Anchorage, AK	E	WQZM678
PEA212	Anchorage, AK	D	WQZM679
PEA341	Alamogordo, NM	F	WQZM680
PEA130	Spokane, WA	F	WQZM681
PEA087	Pensacola, FL	G	WQZM682
PEA166	Redding, CA	A	WQZM683
PEA124	Olympia, WA	A	WQZM684
PEA328	Winslow, AZ	E	WQZM685
PEA109	Rocky Mount, NC	A	WQZM686
PEA100	Greenville, NC	A	WQZM687
PEA103	Winchester, VA	A	WQZM688
PEA301	Rochester, MN	F	WQZM689
PEA301	Rochester, MN	G	WQZM690
PEA381	Del Rio, TX	F	WQZM691

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA095	Bluefield, WV	A	WQZM692
PEA191	Petersburg, VA	G	WQZM693
PEA177	Savannah, GA	G	WQZM694
PEA024	Saint Louis, MO	F	WQZM695
PEA024	Saint Louis, MO	G	WQZM696
PEA184	Ruston, LA	F	WQZM697
PEA246	Auburn, AL	A	WQZM698
PEA192	Fayetteville, NC	A	WQZM699
PEA173	Blacksburg, VA	A	WQZM700
PEA202	Columbus, GA	A	WQZM701
PEA249	Bryan, TX	F	WQZM702
PEA356	Colville, WA	A	WQZM703
PEA229	Saint George, UT	A	WQZM704
PEA257	Cheyenne, WY	A	WQZM705
PEA217	Lubbock, TX	A	WQZM706
PEA189	Alexandria, LA	A	WQZM707
PEA242	Lake Charles, LA	A	WQZM708
PEA235	Amarillo, TX	A	WQZM709
PEA220	Odessa, TX	A	WQZM710
PEA120	Shreveport, LA	A	WQZM711
PEA135	Beaumont, TX	A	WQZM712
PEA317	Beatrice, NE	E	WQZM713
PEA283	Plattsburgh, NY	A	WQZM714
PEA227	Watertown, NY	A	WQZM715
PEA210	Binghamton, NY	A	WQZM716
PEA104	Fort Collins, CO	A	WQZM717

Elizabeth Fishel

---

From: Elizabeth Fishel  
Sent: Sunday, March 15, 2020 12:59 PM  
To: Fox, Russell; Donald Stockdale  
Cc: Sharkey, Steve; Blaise Scinto; Sommer Gilbert; Stephen Buenzow (CTR); Susan Mickley; Wiczorek, Christopher; Charles Mathias  
Subject: FW: STA Request  
Attachments: 600 MHz STA Request -- NewLevel, LLC.pdf

T-Mobile License LLC's request for an emergency STA to operate on the spectrum; and within the market areas associated with NewLevel, LLC's (David J. Grain) 26 WT (600 MHz) licenses has been granted via this email for a period of 60 days. T-Mobile License LLC must cease its operations on this spectrum if David J. Grain withdraws his approval for T-Mobile License LLC's use of this spectrum at any time. T-Mobile License LLC will be using this spectrum to provide relief during the state-of emergency caused by the spread of the coronavirus throughout the United States. This STA is authorized on a secondary non-interference basis. T-Mobile License LLC must cease operating on these frequencies if it causes harmful interference to any primary users. Any structure utilized to operate pursuant to this STA must comply with the height limitations specified in Section 17.7 of the Commission's rules or must be registered with the FAA. T-Mobile License LLC must file an STA application for Special Temporary Authorization to continue its operations within 10 days of today's date (March 15, 2020).

---

From: Fox, Russell <RFox@mintz.com>  
Sent: Friday, March 13, 2020 6:53 PM  
To: Donald Stockdale <Donald.Stockdale@fcc.gov>  
Cc: Charles Mathias <Charles.Mathias@fcc.gov>; Stephen Buenzow (CTR) <Stephen.Buenzow.CTR@fcc.gov>; Sommer Gilbert <Sommer.Gilbert@fcc.gov>; Elizabeth Fishel <Elizabeth.Fishel@fcc.gov>; Blaise Scinto <Blaise.Scinto@fcc.gov>; Susan Mickley <Susan.Mickley@fcc.gov>; Sharkey, Steve <Steve.Sharkey@T-Mobile.com>; Wiczorek, Christopher <Chris.Wiczorek@T-Mobile.com>; Kung, Angela <AYKung@mintz.com>  
Subject: RE: STA Request

Attached are four additional requests for special temporary authority.

Have a good and safe weekend.

---

From: Fox, Russell  
Sent: Friday, March 13, 2020 4:21 PM  
To: 'donald.stockdale@fcc.gov' <[donald.stockdale@fcc.gov](mailto:donald.stockdale@fcc.gov)>  
Cc: 'Charles.Mathias@fcc.gov' <[Charles.Mathias@fcc.gov](mailto:Charles.Mathias@fcc.gov)>; 'Stephen.Buenzow.CTR@fcc.gov' <[Stephen.Buenzow.CTR@fcc.gov](mailto:Stephen.Buenzow.CTR@fcc.gov)>; 'Sommer.Gilbert@fcc.gov' <[Sommer.Gilbert@fcc.gov](mailto:Sommer.Gilbert@fcc.gov)>; 'Elizabeth.Fishel@fcc.gov' <[Elizabeth.Fishel@fcc.gov](mailto:Elizabeth.Fishel@fcc.gov)>; 'Blaise.Scinto@fcc.gov' <[Blaise.Scinto@fcc.gov](mailto:Blaise.Scinto@fcc.gov)>; 'Susan.Mickley@fcc.gov' <[Susan.Mickley@fcc.gov](mailto:Susan.Mickley@fcc.gov)>; Sharkey, Steve <[Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com)>; Wiczorek, Christopher <[Chris.Wiczorek@T-Mobile.com](mailto:Chris.Wiczorek@T-Mobile.com)>; Kung, Angela <[AYKung@mintz.com](mailto:AYKung@mintz.com)>  
Subject: STA Request

Mr. Stockdale:

Attached is a request for special temporary authority submitted on behalf of our client, T-Mobile USA, Inc.

1

If you have any questions, please contact me or T-Mobile's Steve Sharkey.

Russell H Fox  
Member

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.  
701 Pennsylvania Ave., NW, Suite 900, Washington, DC 20004  
[+1.202.434.7483](tel:+12024347483)  
[RFox@mintz.com](mailto:RFox@mintz.com) | [Mintz.com](http://Mintz.com)



---

STATEMENT OF CONFIDENTIALITY:

The information contained in this electronic message and any attachments to this message are intended for the exclusive use of the addressee(s) and may contain confidential or privileged information. If you are not the intended recipient, or the person responsible for delivering the e-mail to the intended recipient, be advised you have received this message in error and that any use, dissemination, forwarding, printing, or copying is strictly prohibited. Please notify Mintz, Levin, Cohn, Ferris, Glovsky and Popeo immediately at either (617) 542-6000 or at [DirectorofIT@Mintz.com](mailto:DirectorofIT@Mintz.com), and destroy all copies of this message and any attachments. You will be reimbursed for reasonable costs incurred in notifying us.



601 Pennsylvania Ave., NW  
Suite 800  
Washington, DC 20004  
202-654-5900

March 13, 2020

**Via E-Mail**

Donald Stockdale  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington DC, 20554

**Re: Emergency Request for Special Temporary Authority**

Dear Mr. Stockdale:

T-Mobile USA, Inc. (“T-Mobile”),<sup>1/</sup> on behalf of its subsidiary, T-Mobile License, LLC and pursuant to Section 1.931 of the Commission’s rules,<sup>2/</sup> hereby requests emergency special temporary authority (“STA”) to use spectrum in the 600 MHz band for which it is not licensed. T-Mobile will use this spectrum to provide enhanced wireless broadband services for a period of sixty (60) days from Commission action to help keep Americans connected during the ongoing novel coronavirus pandemic. T-Mobile seeks Commission action as part of its Keep Americans Connected Pledge to help citizens overcome current challenges that have required them to remain socially distant.<sup>3/</sup>

***STA is in the Public Interest***

With each passing day, more Americans are being separated from each other as the United States continues to fight against the novel coronavirus. Americans have been directed to work from home and take classes remotely.<sup>4/</sup> T-Mobile can help. As the Commission is aware, T-Mobile

---

<sup>1/</sup> T-Mobile USA, Inc. is a wholly owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

<sup>2/</sup> See 47 C.F.R. § 1.931(a)(2)(iv).

<sup>3/</sup> See News Release, *Chairman Pai Launches the Keep Americans Connected Pledge*, FCC (Mar. 13, 2020), <https://docs.fcc.gov/public/attachments/DOC-363033A1.pdf>

<sup>4/</sup> See, e.g., *FCC Encouraging Staff to Telework Due to Coronavirus*, COMM. DAILY (Mar. 12, 2020); Melissa Korn, *Coronavirus Prompts Colleges to Send Students Home*, WALL STREET JOURNAL (Mar. 10, 2020), <https://www.wsj.com/articles/coronavirus-prompts-colleges-to-send-students-home-11583862936?mod=djem10point>; Ben Chapman, *New York City Shuts Two Public Schools Over*

has aggressively built out the 600 MHz spectrum for which it is authorized, delivering both Fourth Generation (“4G”) LTE and Fifth Generation (“5G”) wireless service nationwide.<sup>5/</sup> T-Mobile can even better meet the unprecedented need for our country to be connected by having access to additional 600 MHz spectrum – deploying additional capacity in areas where it has already provided, and where it soon expects to provide, service, including in rural areas. More spectrum capacity will enable Americans to even more effectively telework, engage in distance learning (including taking tests and submitting homework, projects, and other coursework), obtain medical advice through telehealth, and simply remain connected to loved ones who may be quarantined, through applications like FaceTime. And, more capacity on T-Mobile’s network will ensure that first responders and others can communicate in the event of an escalating crisis.

Accordingly, T-Mobile requests authority, for a period of sixty (60) days from Commission action, to use the spectrum listed in Exhibit A, which is currently licensed to NewLevel, LLC (“NewLevel”). NewLevel has consented to T-Mobile's use of the spectrum.<sup>6/</sup> NewLevel is not currently using the licensed spectrum and has agreed to support T-Mobile’s temporary use of it in support of the Keep Americans Connected Pledge.

### ***Requested Rule Waivers***

T-Mobile recognizes that the Commission’s rules generally require that STA requests be submitted electronically on FCC Form 601.<sup>7/</sup> Accordingly, it hereby requests waiver of that rule. Waiver is justified because the Universal Licensing System is not optimized to allow applicants to seek permission to use 600 MHz spectrum for which an applicant is not authorized, on a temporary basis. While T-Mobile could potentially submit a request using FCC Form 601 in a paper format, doing so would elevate form over substance and potentially delay Commission action on this request.<sup>8/</sup> Seeking STA through this letter will likely permit the Commission to act more quickly, allowing T-Mobile to help bridge the connectivity gap sooner. Indeed, the

---

*Coronavirus Case*, WALL STREET JOURNAL (Mar. 12, 2020), <https://www.wsj.com/articles/new-york-city-shuts-two-public-schools-over-coronavirus-case-11584019007?mod=djem10point>.

<sup>5/</sup> See, e.g., T-Mobile News, *T-Mobile Reports Record Financials and Strong Customer Growth in FY 2019, Beating Increased Guidance While Balancing Growth and Profitability* (Feb. 6, 2020), <https://www.t-mobile.com/news/t-mobile-q4-fy19-earnings>; Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile, to Ms. Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268, *et al.*, at 1 (filed Oct. 24, 2019) (reporting that T-Mobile is proceeding on, or ahead of, the schedule the Commission established for clearing the 600 MHz band).

<sup>6/</sup> While NewLevel and T-Mobile may have otherwise sought to permit T-Mobile’s use of the spectrum through the usual Commission leasing process, resulting in T-Mobile’s expeditious use of the spectrum, T-Mobile believes that, because of the unique nature of the 600 MHz spectrum, waiver of the rules may be required, defeating the Commission’s streamlined leasing procedures. (In particular, in order to lease the 600 MHz spectrum, T-Mobile would be required to conduct analyses under Sections 20.22(c)(2) and (3). Grant of this STA request will allow T-Mobile to use the spectrum more quickly by alleviating the need for this analysis.)

<sup>7/</sup> See 47 C.F.R. § 1.931.

<sup>8/</sup> Nevertheless, T-Mobile expects to submit a paper FCC Form 601 within the next ten (10) days confirming this request.

Commission's rules specifically contemplate that STA requests of an urgent nature will be submitted directly to the appropriate Bureau, with the Commission subsequently billing the applicant for the required fees.<sup>9/</sup>

\* \* \* \*

T-Mobile looks forward to your prompt response. If you have any questions, please feel free to contact me directly.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey  
Vice President, Government Affairs  
Technology and Engineering Policy

#### Attachments

cc: (Electronically, with attachments)  
Charles Mathias  
Stephen Buenzow  
Sommer Gilbert  
Elizabeth Fishel  
Blaise Scinto  
Susan Mickley

---

<sup>9/</sup> See 47 C.F.R. § 1.1121.

### Exhibit A

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA013	Orlando, FL	B	WRCP890
PEA014	Cleveland, OH	E	WRCP880
PEA019	Portland, OR	B	WRCP889
PEA021	Tampa, FL	A	WRCP901
PEA023	Pittsburgh, PA	B	WRCP888
PEA025	Cincinnati, OH	E	WRCP878
PEA028	San Antonio, TX	E	WRCP881
PEA029	Jacksonville, FL	B	WRCP894
PEA033	Virginia Beach, VA	E	WRCP876
PEA034	Fresno, CA	B	WRCP887
PEA035	Austin, TX	E	WRCP879
PEA038	Milwaukee, WI	A	WRCP895
PEA039	Oklahoma City, OK	E	WRCP877
PEA042	Honolulu, HI	A	WRCP882
PEA043	Charlotte, NC	E	WRCP885
PEA045	Raleigh, NC	A	WRCP893
PEA050	Greenville, SC	E	WRCP884
PEA057	Richmond, VA	F	WRCP897
PEA062	Dayton, OH	G	WRCP896
PEA063	Tulsa, OK	F	WRCP883
PEA065	Cape Coral, FL	F	WRCP900
PEA067	Sarasota, FL	F	WRCP899
PEA072	Tallahassee, FL	F	WRCP898
PEA078	Greensboro, NC	A	WRCP891
PEA085	Charleston, SC	A	WRCP892
PEA089	Columbia, SC	G	WRCP886

Elizabeth Fishel

---

From: Elizabeth Fishel  
Sent: Sunday, March 15, 2020 1:08 PM  
To: Fox, Russell; Donald Stockdale  
Cc: Stephen Buenzow (CTR); Blaise Scinto; Sommer Gilbert; Susan Mickley; Kung, Angela; Wieczorek, Christopher; Sharkey, Steve  
Subject: FW: STA Request  
Attachments: 600 MHz STA Request -- LB License Co, LLC.pdf

T-Mobile License LLC's request for an emergency STA to operate on the spectrum; and within the market areas associated with LB License Co, LLC's 16 WT (600 MHz) licenses has been granted via this email for a period of days. T-Mobile License LLC must cease its operations on this spectrum if LB License Co, LLC withdraws its approval for T-Mobile License LLC's use of this spectrum at any time. T-Mobile License LLC will be using this spectrum to provide relief during the state-of emergency caused by the spread of the coronavirus throughout the United States. This STA is authorized on a secondary non-interference basis. T-Mobile License LLC must cease operating on these frequencies if it causes harmful interference to any primary users. Any structure utilized to operate pursuant to this STA must comply with the height limitations specified in Section 17.7 of the Commission's rules or must be registered with the FAA. T-Mobile License LLC must file an STA application for Special Temporary Authorization to continue its operations within 10 days of today's date (March 15, 2020).

---

From: Fox, Russell <RFox@mintz.com>  
Sent: Friday, March 13, 2020 6:53 PM  
To: Donald Stockdale <Donald.Stockdale@fcc.gov>  
Cc: Charles Mathias <Charles.Mathias@fcc.gov>; Stephen Buenzow (CTR) <Stephen.Buenzow.CTR@fcc.gov>; Sommer Gilbert <Sommer.Gilbert@fcc.gov>; Elizabeth Fishel <Elizabeth.Fishel@fcc.gov>; Blaise Scinto <Blaise.Scinto@fcc.gov>; Susan Mickley <Susan.Mickley@fcc.gov>; Sharkey, Steve <Steve.Sharkey@T-Mobile.com>; Wieczorek, Christopher <Chris.Wieczorek@T-Mobile.com>; Kung, Angela <AYKung@mintz.com>  
Subject: RE: STA Request

Attached are four additional requests for special temporary authority.

Have a good and safe weekend.

---

From: Fox, Russell  
Sent: Friday, March 13, 2020 4:21 PM  
To: 'donald.stockdale@fcc.gov' <[donald.stockdale@fcc.gov](mailto:donald.stockdale@fcc.gov)>  
Cc: 'Charles.Mathias@fcc.gov' <[Charles.Mathias@fcc.gov](mailto:Charles.Mathias@fcc.gov)>; 'Stephen.Buenzow.CTR@fcc.gov' <[Stephen.Buenzow.CTR@fcc.gov](mailto:Stephen.Buenzow.CTR@fcc.gov)>; 'Sommer.Gilbert@fcc.gov' <[Sommer.Gilbert@fcc.gov](mailto:Sommer.Gilbert@fcc.gov)>; 'Elizabeth.Fishel@fcc.gov' <[Elizabeth.Fishel@fcc.gov](mailto:Elizabeth.Fishel@fcc.gov)>; 'Blaise.Scinto@fcc.gov' <[Blaise.Scinto@fcc.gov](mailto:Blaise.Scinto@fcc.gov)>; 'Susan.Mickley@fcc.gov' <[Susan.Mickley@fcc.gov](mailto:Susan.Mickley@fcc.gov)>; Sharkey, Steve <[Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com)>; Wieczorek, Christopher <[Chris.Wieczorek@T-Mobile.com](mailto:Chris.Wieczorek@T-Mobile.com)>; Kung, Angela <[AYKung@mintz.com](mailto:AYKung@mintz.com)>  
Subject: STA Request

Mr. Stockdale:

Attached is a request for special temporary authority submitted on behalf of our client, T-Mobile USA, Inc.

1

If you have any questions, please contact me or T-Mobile's Steve Sharkey.

Russell H Fox  
Member

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.  
701 Pennsylvania Ave., NW, Suite 900, Washington, DC 20004  
[+1.202.434.7483](tel:+12024347483)  
[RFox@mintz.com](mailto:RFox@mintz.com) | [Mintz.com](http://Mintz.com)



---

STATEMENT OF CONFIDENTIALITY:

The information contained in this electronic message and any attachments to this message are intended for the exclusive use of the addressee(s) and may contain confidential or privileged information. If you are not the intended recipient, or the person responsible for delivering the e-mail to the intended recipient, be advised you have received this message in error and that any use, dissemination, forwarding, printing, or copying is strictly prohibited. Please notify Mintz, Levin, Cohn, Ferris, Glovsky and Popeo immediately at either (617) 542-6000 or at [DirectorofIT@Mintz.com](mailto:DirectorofIT@Mintz.com), and destroy all copies of this message and any attachments. You will be reimbursed for reasonable costs incurred in notifying us.



601 Pennsylvania Ave., NW  
Suite 800  
Washington, DC 20004  
202-654-5900

March 13, 2020

**Via E-Mail**

Donald Stockdale  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington DC, 20554

**Re: Emergency Request for Special Temporary Authority**

Dear Mr. Stockdale:

T-Mobile USA, Inc. (“T-Mobile”),<sup>1/</sup> on behalf of its subsidiary, T-Mobile License, LLC and pursuant to Section 1.931 of the Commission’s rules,<sup>2/</sup> hereby requests emergency special temporary authority (“STA”) to use spectrum in the 600 MHz band for which it is not licensed. T-Mobile will use this spectrum to provide enhanced wireless broadband services for a period of sixty (60) days from Commission action to help keep Americans connected during the ongoing novel coronavirus pandemic. T-Mobile seeks Commission action as part of its Keep Americans Connected Pledge to help citizens overcome current challenges that have required them to remain socially distant.<sup>3/</sup>

***STA is in the Public Interest***

With each passing day, more Americans are being separated from each other as the United States continues to fight against the novel coronavirus. Americans have been directed to work from home and take classes remotely.<sup>4/</sup> T-Mobile can help. As the Commission is aware, T-Mobile

---

<sup>1/</sup> T-Mobile USA, Inc. is a wholly owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

<sup>2/</sup> See 47 C.F.R. § 1.931(a)(2)(iv).

<sup>3/</sup> See News Release, *Chairman Pai Launches the Keep Americans Connected Pledge*, FCC (Mar. 13, 2020), <https://docs.fcc.gov/public/attachments/DOC-363033A1.pdf>

<sup>4/</sup> See, e.g., *FCC Encouraging Staff to Telework Due to Coronavirus*, COMM. DAILY (Mar. 12, 2020); Melissa Korn, *Coronavirus Prompts Colleges to Send Students Home*, WALL STREET JOURNAL (Mar. 10, 2020), <https://www.wsj.com/articles/coronavirus-prompts-colleges-to-send-students-home-11583862936?mod=djem10point>; Ben Chapman, *New York City Shuts Two Public Schools Over*

has aggressively built out the 600 MHz spectrum for which it is authorized, delivering both Fourth Generation (“4G”) LTE and Fifth Generation (“5G”) wireless service nationwide.<sup>5/</sup> T-Mobile can even better meet the unprecedented need for our country to be connected by having access to additional 600 MHz spectrum – deploying additional capacity in areas where it has already provided, and where it soon expects to provide, service, including in rural areas. More spectrum capacity will enable Americans to even more effectively telework, engage in distance learning (including taking tests and submitting homework, projects, and other coursework), obtain medical advice through telehealth, and simply remain connected to loved ones who may be quarantined, through applications like FaceTime. And, more capacity on T-Mobile’s network will ensure that first responders and others can communicate in the event of an escalating crisis.

Accordingly, T-Mobile requests authority, for a period of sixty (60) days from Commission action, to use the spectrum listed in Exhibit A, which is currently licensed to LB License Co, LLC (“LB License”). LB License has consented to T-Mobile's use of the spectrum.<sup>6/</sup> LB License is not currently using the licensed spectrum and has agreed to support T-Mobile’s temporary use of it in support of the Keep Americans Connected Pledge.

### ***Requested Rule Waivers***

T-Mobile recognizes that the Commission’s rules generally require that STA requests be submitted electronically on FCC Form 601.<sup>7/</sup> Accordingly, it hereby requests waiver of that rule. Waiver is justified because the Universal Licensing System is not optimized to allow applicants to seek permission to use 600 MHz spectrum for which an applicant is not authorized, on a temporary basis. While T-Mobile could potentially submit a request using FCC Form 601 in a paper format, doing so would elevate form over substance and potentially delay Commission

---

*Coronavirus Case*, WALL STREET JOURNAL (Mar. 12, 2020), <https://www.wsj.com/articles/new-york-city-shuts-two-public-schools-over-coronavirus-case-11584019007?mod=djem10point>.

<sup>5/</sup> See, e.g., T-Mobile News, *T-Mobile Reports Record Financials and Strong Customer Growth in FY 2019, Beating Increased Guidance While Balancing Growth and Profitability* (Feb. 6, 2020), <https://www.t-mobile.com/news/t-mobile-q4-fy19-earnings>; Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile, to Ms. Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268, *et al.*, at 1 (filed Oct. 24, 2019) (reporting that T-Mobile is proceeding on, or ahead of, the schedule the Commission established for clearing the 600 MHz band).

<sup>6/</sup> While LB License and T-Mobile may have otherwise sought to permit T-Mobile’s use of the spectrum through the usual Commission leasing process, resulting in T-Mobile’s expeditious use of the spectrum, T-Mobile believes that, because of the unique nature of the 600 MHz spectrum, waiver of the rules may be required, defeating the Commission’s streamlined leasing procedures. (In particular, in order to lease the 600 MHz spectrum, T-Mobile would be required to conduct analyses under Sections 20.22(c)(2) and (3). Grant of this STA request will allow T-Mobile to use the spectrum more quickly by alleviating the need for this analysis.) The Commission will note that T-Mobile and LB License have obtained authority for T-Mobile to lease *some* of the spectrum referenced in Exhibit A. This request is not intended to supersede that authority. T-Mobile has simply included all of LB License’s licenses in Exhibit A as a matter of administrative efficiency.

<sup>7/</sup> See 47 C.F.R. § 1.931.

action on this request.<sup>8/</sup> Seeking STA through this letter will likely permit the Commission to act more quickly, allowing T-Mobile to help bridge the connectivity gap sooner. Indeed, the Commission's rules specifically contemplate that STA requests of an urgent nature will be submitted directly to the appropriate Bureau, with the Commission subsequently billing the applicant for the required fees.<sup>9/</sup>

\* \* \* \*

T-Mobile looks forward to your prompt response. If you have any questions, please feel free to contact me directly.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey  
Vice President, Government Affairs  
Technology and Engineering Policy

#### Attachments

cc: (Electronically, with attachments)  
Charles Mathias  
Stephen Buenzow  
Sommer Gilbert  
Elizabeth Fishel  
Blaise Scinto  
Susan Mickley

---

<sup>8/</sup> Nevertheless, T-Mobile expects to submit a paper FCC Form 601 within the next ten (10) days confirming this request.

<sup>9/</sup> See 47 C.F.R. § 1.1121.

### Exhibit A

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA024	Saint Louis, MO	A	WQZM718
PEA024	Saint Louis, MO	B	WQZM719
PEA027	Salt Lake City, UT	D	WQZM720
PEA011	Atlanta, GA	D	WQZM721
PEA004	San Francisco, CA	D	WQZM724
PEA021	Tampa, FA	E	WQZM726
PEA037	Columbus, OH	A	WQZM728
PEA037	Columbus, OH	B	WQZM729
PEA017	Minneapolis-St. Paul, MN	E	WQZM731
PEA016	Seattle, WA	E	WQZM732
PEA006	Philadelphia, PA	E	WQZM733
PEA005	Baltimore, MD-Washington, DC	E	WQZM734
PEA008	Dallas, TX	C	WQZM735
PEA008	Dallas, TX	D	WQZM736
PEA008	Dallas, TX	E	WQZM737
PEA015	Phoenix, AZ	E	WQZM740

Elizabeth Fishel

---

From: Elizabeth Fishel  
Sent: Sunday, March 15, 2020 1:25 PM  
To: Fox, Russell; Donald Stockdale  
Cc: Blaise Scinto; Charles Mathias; Stephen Buenzow (CTR); Sharkey, Steve; Sommer Gilbert; Susan Mickley; Kung, Angela; Wieczorek, Christopher  
Subject: FW: STA Request  
Attachments: 600 MHz STA Request -- Omega Wireless, LLC.pdf

T-Mobile License LLC's request for an emergency STA to operate on the spectrum; and within the market areas that are associated with Omega Wireless, LLC's WT (600 MHz) licenses that are identified in the attached document is granted via this email for a period of 60 days. T-Mobile License LLC must cease its operations on this spectrum if Omega Wireless, LLC withdraws its approval for T-Mobile License LLC's use of this spectrum at any time. T-Mobile License LLC will be using this spectrum to provide relief during the state-of emergency caused by the spread of the coronavirus throughout the United States. This STA is authorized on a secondary non-interference basis. T-Mobile License LLC must cease operating on these frequencies if it causes harmful interference to any primary users. Any structure utilized to operate pursuant to this STA must comply with the height limitations specified in Section 17.7 of the Commission's rules or must be registered with the FAA. T-Mobile License LLC must file an STA application for Special Temporary Authorization to continue its operations within 10 days of today's date (March 15, 2020).

---

From: Fox, Russell <RFox@mintz.com>  
Sent: Sunday, March 15, 2020 7:42 AM  
To: Donald Stockdale <Donald.Stockdale@fcc.gov>  
Cc: Charles Mathias <Charles.Mathias@fcc.gov>; Stephen Buenzow (CTR) <Stephen.Buenzow.CTR@fcc.gov>; Sommer Gilbert <Sommer.Gilbert@fcc.gov>; Elizabeth Fishel <Elizabeth.Fishel@fcc.gov>; Blaise Scinto <Blaise.Scinto@fcc.gov>; Susan Mickley <Susan.Mickley@fcc.gov>; Sharkey, Steve <Steve.Sharkey@T-Mobile.com>; Wieczorek, Christopher <Chris.Wieczorek@T-Mobile.com>; Kung, Angela <AYKung@mintz.com>  
Subject: RE: STA Request

Three additional requests are attached.

Russell

---

From: Fox, Russell <[RFox@mintz.com](mailto:RFox@mintz.com)>  
Sent: Friday, March 13, 2020 6:53 PM  
To: [donald.stockdale@fcc.gov](mailto:donald.stockdale@fcc.gov)  
Cc: [Charles.Mathias@fcc.gov](mailto:Charles.Mathias@fcc.gov); [Stephen.Buenzow.CTR@fcc.gov](mailto:Stephen.Buenzow.CTR@fcc.gov); [Sommer.Gilbert@fcc.gov](mailto:Sommer.Gilbert@fcc.gov); [Elizabeth.Fishel@fcc.gov](mailto:Elizabeth.Fishel@fcc.gov); [Blaise.Scinto@fcc.gov](mailto:Blaise.Scinto@fcc.gov); [Susan.Mickley@fcc.gov](mailto:Susan.Mickley@fcc.gov); Sharkey, Steve <[Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com)>; Wieczorek, Christopher <[Chris.Wieczorek@T-Mobile.com](mailto:Chris.Wieczorek@T-Mobile.com)>; Kung, Angela <[AYKung@mintz.com](mailto:AYKung@mintz.com)>  
Subject: RE: STA Request

Attached are four additional requests for special temporary authority.

---

Have a good and safe weekend.

1

From: Fox, Russell  
Sent: Friday, March 13, 2020 4:21 PM  
To: 'donald.stockdale@fcc.gov' <[donald.stockdale@fcc.gov](mailto:donald.stockdale@fcc.gov)>  
Cc: 'Charles.Mathias@fcc.gov' <[Charles.Mathias@fcc.gov](mailto:Charles.Mathias@fcc.gov)>; 'Stephen.Buenzow.CTR@fcc.gov' <[Stephen.Buenzow.CTR@fcc.gov](mailto:Stephen.Buenzow.CTR@fcc.gov)>; 'Sommer.Gilbert@fcc.gov' <[Sommer.Gilbert@fcc.gov](mailto:Sommer.Gilbert@fcc.gov)>; 'Elizabeth.Fishel@fcc.gov' <[Elizabeth.Fishel@fcc.gov](mailto:Elizabeth.Fishel@fcc.gov)>; 'Blaise.Scinto@fcc.gov' <[Blaise.Scinto@fcc.gov](mailto:Blaise.Scinto@fcc.gov)>; 'Susan.Mickley@fcc.gov' <[Susan.Mickley@fcc.gov](mailto:Susan.Mickley@fcc.gov)>; Sharkey, Steve <[Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com)>; Wieczorek, Christopher <[Chris.Wieczorek@T-Mobile.com](mailto:Chris.Wieczorek@T-Mobile.com)>; Kung, Angela <[AYKung@mintz.com](mailto:AYKung@mintz.com)>  
Subject: STA Request

Mr. Stockdale:

Attached is a request for special temporary authority submitted on behalf of our client, T-Mobile USA, Inc.

If you have any questions, please contact me or T-Mobile's Steve Sharkey.

Russell H Fox  
Member

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.  
701 Pennsylvania Ave., NW, Suite 900, Washington, DC 20004 [+1.202.434.7483](tel:+12024347483)  
[RFox@mintz.com](mailto:RFox@mintz.com) | [Mintz.com](http://Mintz.com)



---

STATEMENT OF CONFIDENTIALITY:

The information contained in this electronic message and any attachments to this message are intended for the exclusive use of the addressee(s) and may contain confidential or privileged information. If you are not the intended recipient, or the person responsible for delivering the e-mail to the intended recipient, be advised you have received this message in error and that any use, dissemination, forwarding, printing, or copying is strictly prohibited. Please notify Mintz, Levin, Cohn, Ferris, Glovsky and Popeo immediately at either (617) 542-6000 or at [DirectorofIT@Mintz.com](mailto:DirectorofIT@Mintz.com), and destroy all copies of this message and any attachments. You will be reimbursed for reasonable costs incurred in notifying us.



601 Pennsylvania Ave., NW  
Suite 800  
Washington, DC 20004  
202-654-5900

March 15, 2020

**Via E-Mail**

Donald Stockdale  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington DC, 20554

**Re: Emergency Request for Special Temporary Authority**

Dear Mr. Stockdale:

T-Mobile USA, Inc. (“T-Mobile”),<sup>1/</sup> on behalf of its subsidiary, T-Mobile License, LLC and pursuant to Section 1.931 of the Commission’s rules,<sup>2/</sup> hereby requests emergency special temporary authority (“STA”) to use spectrum in the 600 MHz band for which it is not licensed. T-Mobile will use this spectrum to provide enhanced wireless broadband services for a period of sixty (60) days from Commission action to help keep Americans connected during the ongoing novel coronavirus pandemic. T-Mobile seeks Commission action as part of its Keep Americans Connected Pledge to help citizens overcome current challenges that have required them to remain socially distant.<sup>3/</sup>

***STA is in the Public Interest***

With each passing day, more Americans are being separated from each other as the United States continues to fight against the novel coronavirus. Americans have been directed to work from home and take classes remotely.<sup>4/</sup> T-Mobile can help. As the Commission is aware, T-Mobile

---

<sup>1/</sup> T-Mobile USA, Inc. is a wholly owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

<sup>2/</sup> See 47 C.F.R. § 1.931(a)(2)(iv).

<sup>3/</sup> See News Release, *Chairman Pai Launches the Keep Americans Connected Pledge*, FCC (Mar. 13, 2020), <https://docs.fcc.gov/public/attachments/DOC-363033A1.pdf>

<sup>4/</sup> See, e.g., *FCC Encouraging Staff to Telework Due to Coronavirus*, COMM. DAILY (Mar. 12, 2020); Melissa Korn, *Coronavirus Prompts Colleges to Send Students Home*, WALL STREET JOURNAL (Mar. 10, 2020), <https://www.wsj.com/articles/coronavirus-prompts-colleges-to-send-students-home-11583862936?mod=djem10point>; Ben Chapman, *New York City Shuts Two Public Schools Over*

has aggressively built out the 600 MHz spectrum for which it is authorized, delivering both Fourth Generation (“4G”) LTE and Fifth Generation (“5G”) wireless service nationwide.<sup>5/</sup> T-Mobile can even better meet the unprecedented need for our country to be connected by having access to additional 600 MHz spectrum – deploying additional capacity in areas where it has already provided, and where it soon expects to provide, service, including in rural areas. More spectrum capacity will enable Americans to even more effectively telework, engage in distance learning (including taking tests and submitting homework, projects, and other coursework), obtain medical advice through telehealth, and simply remain connected to loved ones who may be quarantined, through applications like FaceTime. And, more capacity on T-Mobile’s network will ensure that first responders and others can communicate in the event of an escalating crisis.

Accordingly, T-Mobile requests authority, for a period of sixty (60) days from Commission action, to use the spectrum listed in Exhibit A, which is currently licensed to Omega Wireless, LLC (“Omega”). Omega has consented to T-Mobile's use of the spectrum.<sup>6/</sup> Omega is not currently using the licensed spectrum and has agreed to support T-Mobile’s temporary use of it in support of the Keep Americans Connected Pledge.

### ***Requested Rule Waivers***

T-Mobile recognizes that the Commission’s rules generally require that STA requests be submitted electronically on FCC Form 601.<sup>7/</sup> Accordingly, it hereby requests waiver of that rule. Waiver is justified because the Universal Licensing System is not optimized to allow applicants to seek permission to use 600 MHz spectrum for which an applicant is not authorized, on a temporary basis. While T-Mobile could potentially submit a request using FCC Form 601 in a paper format, doing so would elevate form over substance and potentially delay Commission action on this request.<sup>8/</sup> Seeking STA through this letter will likely permit the Commission to act more quickly, allowing T-Mobile to help bridge the connectivity gap sooner. Indeed, the

---

*Coronavirus Case*, WALL STREET JOURNAL (Mar. 12, 2020), <https://www.wsj.com/articles/new-york-city-shuts-two-public-schools-over-coronavirus-case-11584019007?mod=djem10point>.

<sup>5/</sup> See, e.g., T-Mobile News, *T-Mobile Reports Record Financials and Strong Customer Growth in FY 2019, Beating Increased Guidance While Balancing Growth and Profitability* (Feb. 6, 2020), <https://www.t-mobile.com/news/t-mobile-q4-fy19-earnings>; Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile, to Ms. Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268, *et al.*, at 1 (filed Oct. 24, 2019) (reporting that T-Mobile is proceeding on, or ahead of, the schedule the Commission established for clearing the 600 MHz band).

<sup>6/</sup> While Omega and T-Mobile may have otherwise sought to permit T-Mobile’s use of the spectrum through the usual Commission leasing process, resulting in T-Mobile’s expeditious use of the spectrum, T-Mobile believes that, because of the unique nature of the 600 MHz spectrum, waiver of the rules may be required, defeating the Commission’s streamlined leasing procedures. (In particular, in order to lease the 600 MHz spectrum, T-Mobile would be required to conduct analyses under Sections 20.22(c)(2) and (3). Grant of this STA request will allow T-Mobile to use the spectrum more quickly by alleviating the need for this analysis.)

<sup>7/</sup> See 47 C.F.R. § 1.931.

<sup>8/</sup> Nevertheless, T-Mobile expects to submit a paper FCC Form 601 within the next ten (10) days confirming this request.

Commission's rules specifically contemplate that STA requests of an urgent nature will be submitted directly to the appropriate Bureau, with the Commission subsequently billing the applicant for the required fees.<sup>9/</sup>

\* \* \* \*

T-Mobile looks forward to your prompt response. If you have any questions, please feel free to contact me directly.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey  
Vice President, Government Affairs  
Technology and Engineering Policy

#### Attachments

cc: (Electronically, with attachments)  
Charles Mathias  
Stephen Buenzow  
Sommer Gilbert  
Elizabeth Fishel  
Blaise Scinto  
Susan Mickley

---

<sup>9/</sup> See 47 C.F.R. § 1.1121.

**Exhibit A**

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA246	Auburn, AL	G	WRBY677
PEA246	Auburn, AL	F	WRBY678
PEA192	Fayetteville, NC	F	WRBY679
PEA202	Columbus, GA	F	WRBY680
PEA202	Columbus, GA	G	WRBY681
PEA173	Blacksburg, VA	F	WRBY682
PEA173	Blacksburg, VA	G	WRBY683
PEA192	Fayetteville, NC	G	WRBY684
PEA048	Harrisburg, PA	F	WRBY685
PEA130	Spokane, WA	G	WRBY686
PEA261	Fargo, ND	F	WRBY687
PEA261	Fargo, ND	G	WRBY688
PEA226	Lima, OH	G	WRBY689
PEA226	Lima, OH	F	WRBY690
PEA127	Evansville, IN	F	WRBY691
PEA387	Wahpeton, ND	E	WRBY692
PEA098	Johnson City, TN	F	WRBY693
PEA055	Huntsville, AL	F	WRBY694
PEA132	Corpus Christi, TX	A	WRBY695
PEA257	Cheyenne, WY	F	WRBY696
PEA257	Cheyenne, WY	G	WRBY697
PEA217	Lubbock, TX	F	WRBY698
PEA217	Lubbock, TX	G	WRBY699
PEA189	Alexandria, LA	F	WRBY700
PEA189	Alexandria, LA	G	WRBY701
PEA242	Lake Charles, LA	F	WRBY702
PEA242	Lake Charles, LA	G	WRBY703
PEA235	Amarillo, TX	F	WRBY704
PEA235	Amarillo, TX	G	WRBY705
PEA220	Odessa, TX	F	WRBY706
PEA220	Odessa, TX	G	WRBY707
PEA120	Shreveport, LA	F	WRBY708
PEA120	Shreveport, LA	G	WRBY709
PEA135	Beaumont, TX	F	WRBY710
PEA135	Beaumont, TX	G	WRBY711
PEA107	Bangor, ME	A	WRBY712
PEA062	Dayton, OH	A	WRBY713
PEA172	Duluth, MN	A	WRBY714
PEA319	Albany, GA	G	WRBY715
PEA139	Hot Springs, AR	G	WRBY716

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA394	Martin, SD	G	WRBY717
PEA101	Wichita, KS	G	WRBY718
PEA101	Wichita, KS	F	WRBY719
PEA073	El Paso, TX	F	WRBY720
PEA073	El Paso, TX	G	WRBY721
PEA266	Lenoir, NC	A	WRBY722
PEA068	Grand Rapids, MI	F	WRBY723
PEA056	Kalamazoo, MI	F	WRBY724
PEA061	Toledo, OH	F	WRBY725
PEA197	Wheeling, WV	F	WRBY726
PEA121	Altoona, PA	F	WRBY727
PEA194	State College, PA	F	WRBY728
PEA159	Valdosta, GA	G	WRBY729
PEA247	Nampa, ID	F	WRBY730
PEA156	Boise City, ID	F	WRBY731
PEA052	Charleston, WV	F	WRBY732
PEA052	Charleston, WV	G	WRBY733
PEA054	Buffalo, NY	F	WRBY734
PEA096	Richmond, KY	F	WRBY735
PEA283	Plattsburgh, NY	F	WRBY736
PEA283	Plattsburgh, NY	G	WRBY737
PEA227	Watertown, NY	F	WRBY738
PEA227	Watertown, NY	G	WRBY739
PEA210	Binghamton, NY	F	WRBY740
PEA210	Binghamton, NY	G	WRBY741
PEA360	Juneau, AK	F	WRBY742
PEA360	Juneau, AK	G	WRBY743
PEA212	Anchorage, AK	G	WRBY744
PEA212	Anchorage, AK	F	WRBY745
PEA188	Jamestown, NY	F	WRBY746
PEA138	Burlington, VT	F	WRBY747
PEA184	Ruston, LA	G	WRBY748
PEA366	Pullman, WA	A	WRBY749
PEA093	Lafayette, LA	F	WRBY750
PEA093	Lafayette, LA	G	WRBY751
PEA111	Fayetteville, AR	F	WRBY752
PEA111	Fayetteville, AR	G	WRBY753
PEA086	Frankfort, KY	F	WRBY754
PEA086	Frankfort, KY	G	WRBY755
PEA082	Baton Rouge, LA	F	WRBY756
PEA082	Baton Rouge, LA	G	WRBY757
PEA308	Americus, GA	F	WRBY758

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA262	Hilton Head Island, SC	F	WRBY759
PEA128	Macon, GA	F	WRBY760
PEA151	Winston-Salem, NC	F	WRBY761
PEA336	Grand Forks, ND	A	WRBY762
PEA335	Natchitoches, LA	G	WRBY763
PEA044	Rochester, NY	A	WRBY764
PEA274	Twin Falls, ID	F	WRBY765
PEA274	Twin Falls, ID	G	WRBY766
PEA187	Pocatello, ID	F	WRBY767
PEA187	Pocatello, ID	G	WRBY768
PEA279	Logan, UT	F	WRBY769
PEA279	Logan, UT	G	WRBY770
PEA158	Helena, MT	F	WRBY771
PEA158	Helena, MT	G	WRBY772
PEA089	Columbia, SC	A	WRBY773
PEA329	Kingsville, TX	A	WRBY774
PEA113	Erie, PA	F	WRBY775
PEA092	Decatur, IL	F	WRBY776
PEA083	Fort Wayne, IN	F	WRBY777
PEA064	South Bend, IN	F	WRBY778
PEA058	Bloomington, IN	F	WRBY779
PEA326	Fergus Falls, MN	A	WRBY780
PEA074	Chattanooga, TN	A	WRBY781
PEA129	Springfield, IL	F	WRBY782
PEA215	Hickory, NC	G	WRBY783
PEA049	Albany, NY	F	WRBY784
PEA049	Albany, NY	G	WRBY785
PEA041	Syracuse, NY	F	WRBY786
PEA041	Syracuse, NY	G	WRBY787
PEA198	Jonesboro, AR	G	WRBY788
PEA198	Jonesboro, AR	F	WRBY789
PEA216	Joplin, MO	F	WRBY790
PEA216	Joplin, MO	G	WRBY791
PEA232	Topeka, KS	F	WRBY792
PEA232	Topeka, KS	G	WRBY793
PEA164	Montgomery, AL	F	WRBY794
PEA164	Montgomery, AL	G	WRBY795

Elizabeth Fishel

---

From: Elizabeth Fishel  
Sent: Sunday, March 15, 2020 1:52 PM  
To: Donald Stockdale; Fox, Russell; Kung, Angela  
Cc: Sharkey, Steve; Wieczorek, Christopher; Charles Mathias; Blaise Scinto; Sommer Gilbert; Susan Mickley; Stephen Buenzow (CTR); Wieczorek, Christopher  
Subject: FW: STA Request  
Attachments: 600 MHz STA Request -- TStar License Holdings, LLC.pdf

T-Mobile License LLC's request for an emergency STA to operate on the spectrum; and within the market areas that are associated with TStar License Holdings, LLC's WT (600 MHz) licenses that are identified in the attached document is granted via this email for a period of 60 days. T-Mobile License LLC must cease its operations on this spectrum if TStar License Holdings, LLC withdraws its approval for T-Mobile License LLC's use of this spectrum at any time. T-Mobile License LLC will be using this spectrum to provide relief during the state-of emergency caused by the spread of the coronavirus throughout the United States. This STA is authorized on a secondary non-interference basis. T-Mobile License LLC must cease operating on these frequencies if it causes harmful interference to any primary users. Any structure utilized to operate pursuant to this STA must comply with the height limitations specified in Section 17.7 of the Commission's rules or must be registered with the FAA. T-Mobile License LLC must file an STA application for Special Temporary Authorization to continue its operations within 10 days of today's date (March 15, 2020).

---

From: Kung, Angela <AYKung@mintz.com>  
Sent: Sunday, March 15, 2020 1:38 PM  
To: Donald Stockdale <Donald.Stockdale@fcc.gov>  
Cc: Charles Mathias <Charles.Mathias@fcc.gov>; Stephen Buenzow (CTR) <Stephen.Buenzow.CTR@fcc.gov>; Sommer Gilbert <Sommer.Gilbert@fcc.gov>; Elizabeth Fishel <Elizabeth.Fishel@fcc.gov>; Blaise Scinto <Blaise.Scinto@fcc.gov>; Susan Mickley <Susan.Mickley@fcc.gov>; Sharkey, Steve <Steve.Sharkey@T-Mobile.com>; Wieczorek, Christopher <Chris.Wieczorek@T-Mobile.com>; Fox, Russell <RFox@mintz.com>  
Subject: RE: STA Request

Please find an additional request attached.

Thanks,

Angela Kung  
Of Counsel

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.  
701 Pennsylvania Ave., NW, Suite 900, Washington, DC 20004 [+1.202.434.7320](tel:+12024347320)  
[AYKung@mintz.com](mailto:AYKung@mintz.com) | [Mintz.com](http://Mintz.com)



---

From: Fox, Russell <[RFox@mintz.com](mailto:RFox@mintz.com)>  
Sent: Sunday, March 15, 2020 7:42 AM  
To: [donald.stockdale@fcc.gov](mailto:donald.stockdale@fcc.gov)  
Cc: [Charles.Mathias@fcc.gov](mailto:Charles.Mathias@fcc.gov); [Stephen.Buenzow.CTR@fcc.gov](mailto:Stephen.Buenzow.CTR@fcc.gov); [Sommer.Gilbert@fcc.gov](mailto:Sommer.Gilbert@fcc.gov); [Elizabeth.Fishel@fcc.gov](mailto:Elizabeth.Fishel@fcc.gov); [Blaise.Scinto@fcc.gov](mailto:Blaise.Scinto@fcc.gov); [Susan.Mickley@fcc.gov](mailto:Susan.Mickley@fcc.gov); Sharkey, Steve <[Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com)>; Wieczorek, Christopher <[Chris.Wieczorek@T-Mobile.com](mailto:Chris.Wieczorek@T-Mobile.com)>; Kung, Angela <[AYKung@mintz.com](mailto:AYKung@mintz.com)>  
Subject: RE: STA Request

Three additional requests are attached.

Russell

---

From: Fox, Russell <[RFox@mintz.com](mailto:RFox@mintz.com)>  
Sent: Friday, March 13, 2020 6:53 PM  
To: [donald.stockdale@fcc.gov](mailto:donald.stockdale@fcc.gov)  
Cc: [Charles.Mathias@fcc.gov](mailto:Charles.Mathias@fcc.gov); [Stephen.Buenzow.CTR@fcc.gov](mailto:Stephen.Buenzow.CTR@fcc.gov); [Sommer.Gilbert@fcc.gov](mailto:Sommer.Gilbert@fcc.gov); [Elizabeth.Fishel@fcc.gov](mailto:Elizabeth.Fishel@fcc.gov); [Blaise.Scinto@fcc.gov](mailto:Blaise.Scinto@fcc.gov); [Susan.Mickley@fcc.gov](mailto:Susan.Mickley@fcc.gov); Sharkey, Steve <[Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com)>; Wieczorek, Christopher <[Chris.Wieczorek@T-Mobile.com](mailto:Chris.Wieczorek@T-Mobile.com)>; Kung, Angela <[AYKung@mintz.com](mailto:AYKung@mintz.com)>  
Subject: RE: STA Request

Attached are four additional requests for special temporary authority.

Have a good and safe weekend.

---

From: Fox, Russell  
Sent: Friday, March 13, 2020 4:21 PM  
To: 'donald.stockdale@fcc.gov' <[donald.stockdale@fcc.gov](mailto:donald.stockdale@fcc.gov)>  
Cc: 'Charles.Mathias@fcc.gov' <[Charles.Mathias@fcc.gov](mailto:Charles.Mathias@fcc.gov)>; 'Stephen.Buenzow.CTR@fcc.gov' <[Stephen.Buenzow.CTR@fcc.gov](mailto:Stephen.Buenzow.CTR@fcc.gov)>; 'Sommer.Gilbert@fcc.gov' <[Sommer.Gilbert@fcc.gov](mailto:Sommer.Gilbert@fcc.gov)>; 'Elizabeth.Fishel@fcc.gov' <[Elizabeth.Fishel@fcc.gov](mailto:Elizabeth.Fishel@fcc.gov)>; 'Blaise.Scinto@fcc.gov' <[Blaise.Scinto@fcc.gov](mailto:Blaise.Scinto@fcc.gov)>; 'Susan.Mickley@fcc.gov' <[Susan.Mickley@fcc.gov](mailto:Susan.Mickley@fcc.gov)>; Sharkey, Steve <[Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com)>; Wieczorek, Christopher <[Chris.Wieczorek@T-Mobile.com](mailto:Chris.Wieczorek@T-Mobile.com)>; Kung, Angela <[AYKung@mintz.com](mailto:AYKung@mintz.com)>  
Subject: STA Request

Mr. Stockdale:

Attached is a request for special temporary authority submitted on behalf of our client, T-Mobile USA, Inc.

If you have any questions, please contact me or T-Mobile's Steve Sharkey.

Russell H Fox

Member

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

701 Pennsylvania Ave., NW, Suite 900, Washington, DC 20004 [+1.202.434.7483](tel:+12024347483)

[RFox@mintz.com](mailto:RFox@mintz.com) | [Mintz.com](http://Mintz.com)



---

STATEMENT OF CONFIDENTIALITY:

The information contained in this electronic message and any attachments to this message are intended for the exclusive use of the addressee(s) and may contain confidential or privileged information. If you are not the intended recipient, or the person responsible for delivering the e-mail to the intended recipient, be advised you have received this message in error and that any use, dissemination, forwarding, printing, or copying is strictly prohibited. Please notify Mintz, Levin, Cohn, Ferris, Glovsky and Popeo immediately at either (617) 542-6000 or at [DirectorofIT@Mintz.com](mailto:DirectorofIT@Mintz.com), and destroy all copies of this message and any attachments. You will be reimbursed for reasonable costs incurred in notifying us.



601 Pennsylvania Ave., NW  
Suite 800  
Washington, DC 20004  
202-654-5900

March 15, 2020

**Via E-Mail**

Donald Stockdale  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington DC, 20554

**Re: Emergency Request for Special Temporary Authority**

Dear Mr. Stockdale:

T-Mobile USA, Inc. (“T-Mobile”),<sup>1/</sup> on behalf of its subsidiary, T-Mobile License, LLC and pursuant to Section 1.931 of the Commission’s rules,<sup>2/</sup> hereby requests emergency special temporary authority (“STA”) to use spectrum in the 600 MHz band for which it is not licensed. T-Mobile will use this spectrum to provide enhanced wireless broadband services for a period of sixty (60) days from Commission action to help keep Americans connected during the ongoing novel coronavirus pandemic. T-Mobile seeks Commission action as part of its Keep Americans Connected Pledge to help citizens overcome current challenges that have required them to remain socially distant.<sup>3/</sup>

***STA is in the Public Interest***

With each passing day, more Americans are being separated from each other as the United States continues to fight against the novel coronavirus. Americans have been directed to work from home and take classes remotely.<sup>4/</sup> T-Mobile can help. As the Commission is aware, T-Mobile

---

<sup>1/</sup> T-Mobile USA, Inc. is a wholly owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

<sup>2/</sup> See 47 C.F.R. § 1.931(a)(2)(iv).

<sup>3/</sup> See News Release, *Chairman Pai Launches the Keep Americans Connected Pledge*, FCC (Mar. 13, 2020), <https://docs.fcc.gov/public/attachments/DOC-363033A1.pdf>

<sup>4/</sup> See, e.g., *FCC Encouraging Staff to Telework Due to Coronavirus*, COMM. DAILY (Mar. 12, 2020); Melissa Korn, *Coronavirus Prompts Colleges to Send Students Home*, WALL STREET JOURNAL (Mar. 10, 2020), <https://www.wsj.com/articles/coronavirus-prompts-colleges-to-send-students-home-11583862936?mod=djem10point>; Ben Chapman, *New York City Shuts Two Public Schools Over*

has aggressively built out the 600 MHz spectrum for which it is authorized, delivering both Fourth Generation (“4G”) LTE and Fifth Generation (“5G”) wireless service nationwide.<sup>5/</sup> T-Mobile can even better meet the unprecedented need for our country to be connected by having access to additional 600 MHz spectrum – deploying additional capacity in areas where it has already provided, and where it soon expects to provide, service, including in rural areas. More spectrum capacity will enable Americans to even more effectively telework, engage in distance learning (including taking tests and submitting homework, projects, and other coursework), obtain medical advice through telehealth, and simply remain connected to loved ones who may be quarantined, through applications like FaceTime. And, more capacity on T-Mobile’s network will ensure that first responders and others can communicate in the event of an escalating crisis.

Accordingly, T-Mobile requests authority, for a period of sixty (60) days from Commission action, to use the spectrum listed in Exhibit A, which is currently licensed to TStar License Holdings, LLC (“TStar”). TStar has consented to T-Mobile's use of the spectrum.<sup>6/</sup> TStar is not currently using the licensed spectrum and has agreed to support T-Mobile’s temporary use of it in support of the Keep Americans Connected Pledge.

### ***Requested Rule Waivers***

T-Mobile recognizes that the Commission’s rules generally require that STA requests be submitted electronically on FCC Form 601.<sup>7/</sup> Accordingly, it hereby requests waiver of that rule. Waiver is justified because the Universal Licensing System is not optimized to allow applicants to seek permission to use 600 MHz spectrum for which an applicant is not authorized, on a temporary basis. While T-Mobile could potentially submit a request using FCC Form 601 in a paper format, doing so would elevate form over substance and potentially delay Commission action on this request.<sup>8/</sup> Seeking STA through this letter will likely permit the Commission to act more quickly, allowing T-Mobile to help bridge the connectivity gap sooner. Indeed, the

---

*Coronavirus Case*, WALL STREET JOURNAL (Mar. 12, 2020), <https://www.wsj.com/articles/new-york-city-shuts-two-public-schools-over-coronavirus-case-11584019007?mod=djem10point>.

<sup>5/</sup> See, e.g., T-Mobile News, *T-Mobile Reports Record Financials and Strong Customer Growth in FY 2019, Beating Increased Guidance While Balancing Growth and Profitability* (Feb. 6, 2020), <https://www.t-mobile.com/news/t-mobile-q4-fy19-earnings>; Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile, to Ms. Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268, *et al.*, at 1 (filed Oct. 24, 2019) (reporting that T-Mobile is proceeding on, or ahead of, the schedule the Commission established for clearing the 600 MHz band).

<sup>6/</sup> While TStar and T-Mobile may have otherwise sought to permit T-Mobile’s use of the spectrum through the usual Commission leasing process, resulting in T-Mobile’s expeditious use of the spectrum, T-Mobile believes that, because of the unique nature of the 600 MHz spectrum, waiver of the rules may be required, defeating the Commission’s streamlined leasing procedures. (In particular, in order to lease the 600 MHz spectrum, T-Mobile would be required to conduct analyses under Sections 20.22(c)(2) and (3). Grant of this STA request will allow T-Mobile to use the spectrum more quickly by alleviating the need for this analysis.)

<sup>7/</sup> See 47 C.F.R. § 1.931.

<sup>8/</sup> Nevertheless, T-Mobile expects to submit a paper FCC Form 601 within the next ten (10) days confirming this request.

Commission's rules specifically contemplate that STA requests of an urgent nature will be submitted directly to the appropriate Bureau, with the Commission subsequently billing the applicant for the required fees.<sup>9/</sup>

\* \* \* \*

T-Mobile looks forward to your prompt response. If you have any questions, please feel free to contact me directly.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey  
Vice President, Government Affairs  
Technology and Engineering Policy

#### Attachments

cc: (Electronically, with attachments)  
Charles Mathias  
Stephen Buenzow  
Sommer Gilbert  
Elizabeth Fishel  
Blaise Scinto  
Susan Mickley

---

<sup>9/</sup> See 47 C.F.R. § 1.1121.

**Exhibit A**

<b>Market</b>	<b>Market Name</b>	<b>Block</b>	<b>Call Sign</b>
PEA066	Lansing, MI	E	WQZM722
PEA026	Las Vegas, NV	B	WQZM723
PEA069	Springfield, MA	F	WQZM725
PEA040	Birmingham, AL	E	WQZM727
PEA046	Little Rock, AR	A	WQZM730
PEA084	Mobile, AL	F	WQZM738
PEA084	Mobile, AL	G	WQZM739
PEA031	Indianapolis, IN	G	WRAM792
PEA022	Sacramento, CA	G	WRAM793
PEA015	Phoenix, AZ	A	WRAM794
PEA087	Pensacola, FL	A	WRAM795
PEA050	Greenville, SC	A	WRAM796
PEA043	Charlotte, NC	A	WRAM797
PEA028	San Antonio, TX	A	WRAM798
PEA051	Louisville, KY	E	WRAM799
PEA029	Jacksonville, FL	A	WRAM800
PEA032	Nashville, TN	G	WRAM801
PEA036	New Orleans, LA	G	WRAM802
PEA040	Birmingham, AL	A	WRAM803